2017 ASSESSMENT OF FAIR HOUSING FOR THE COMMUNITY DEVELOPMENT COMMISSION AND HOUSING AUTHORITY OF THE COUNTY OF LOS ANGELES



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And

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Draft Report for Public Review August 13, 2017

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COVER PAGE

- 1. Submission date: October 4, 2017
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- 6. Submitter members (if applicable): Community Development Commission and Housing Authority of the County of Los Angeles
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 - g. Zip code: 91801
- 8. Period covered by this assessment: 2018-2023
- 9. Initial, amended, or renewal AFH: Initial
- 10. To the best of its knowledge and belief, the statements and information contained herein are true, accurate, and complete and the program participant has developed this AFH in compliance with the requirements of 24 C.F.R. §§ 5.150-5.180 or comparable replacement regulations of the Department of Housing and Urban Development;
- 11. The program participant will take meaningful actions to further the goals identified in its AFH conducted in accordance with the requirements in §§ 5.150 through 5.180 and 24 C.F.R. §§ 91.225(a)(1), 91.325(a)(1), 91.425(a)(1), 570.487(b)(1), 570.601, 903.7(o), and 903.15(d), as applicable.

All Joint and Regional Participants are bound by the certification, except that some of the analysis, goals or priorities included in the AFH may only apply to an individual program participant as expressly stated in the AFH.

(Signature)	(date)		
(Signature)	(date)		
(Signature)	(date)		
	Depar	tmental acceptar	nce or non-acceptance:
	(Signa	ature)	(date)

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SECTION I. EXECUTIVE SUMMARY

OVERVIEW

Title VIII of the 1968 Civil Rights Act, also known as the Federal Fair Housing Act, made it illegal to discriminate in the buying, selling, or renting of housing based on a person's race, color, religion, or national origin. Sex was added as a protected class in the 1970s. In 1988, the Fair Housing Amendments Act added familial status and disability to the list, making a total of seven federally protected characteristics. Federal fair housing statutes are largely covered by the following three pieces of U.S. legislation:

- 1. The Fair Housing Act,
- 2. The Housing Amendments Act, and
- 3. The Americans with Disabilities Act.

The purpose of fair housing law is to protect a person's right to own, sell, purchase, or rent housing of his or her choice without fear of unlawful discrimination. The goal of fair housing law is to allow everyone equal opportunity to access housing. In 1959, California passed its Fair Employment and Housing Law, covering the same protected classes as noted in Federal Law.

ASSESSING FAIR HOUSING

Provisions to affirmatively further fair housing are long-standing components of the U.S. Department of Housing and Urban Development's (HUD) housing and community development programs. These provisions come from Section 808(e) (5) of the Federal Fair Housing Act, which requires that the Secretary of HUD administer federal housing and urban development programs in a manner that affirmatively furthers fair housing.

In 1994, HUD published a rule consolidating plans for housing and community development programs into a single planning process. This action grouped the Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), Emergency Shelter Grants (ESG)¹, and Housing Opportunities for Persons with AIDS (HOPWA) programs into the Consolidated Plan for Housing and Community Development, which then created a single application cycle.

As a part of the consolidated planning process, and entitlement communities that receive such funds as a formula allocation directly from HUD are required to submit to HUD certification that they are affirmatively furthering fair housing (AFFH).

The Community Development Commission of the County of Los Angeles (CDC) and the Housing Authority of the County of Los Angeles (HACoLA) have formed a joint effort to prepare, conduct, and submit to HUD their certification for AFFH, which is presented in this Assessment of Fair Housing (AFH).

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¹ The Emergency Shelter Grants program was renamed the Emergency Solutions Grants program in 2011.

AGENCY DESCRIPTIONS

The following agencies and programs factor prominently in this AFH and are thus summarized briefly below.

COMMUNITY DEVELOPMENT COMMISSION

In 1982, the Los Angeles County Board of Supervisors consolidated three entities – the Housing Authority, the Community Development Department, and the Redevelopment Agency – to form the Community Development Commission (CDC). Today, the CDC is comprised of two separate legal entities, the Housing Authority of the County of Los Angeles (Housing Authority) and the CDC, both of which are part of the County family, but are independent agencies and not County Departments.

The Board of Supervisors currently serves as the Commissioners of the CDC — which includes serving as the Commissioners of the Housing Authority of the County of Los Angeles (Housing Authority) — setting policy for the agency. The Board of Commissioners receives input from the agency's Housing Commission, which meets monthly at various locations throughout the County. Comprised of Board appointees and Housing Authority tenants, it is the Housing Commission's responsibility to review and make recommendations on matters that will be presented to the Board of Commissioners for approval, including Section 8 and public housing policies and procedures.

Although the State of California dissolved all redevelopment agencies in February 2012, the CDC continues to serve in the County of Los Angeles as an affordable housing, and community and economic development agency. The CDC's wide-ranging programs benefit residents and business owners in the unincorporated Los Angeles County areas and in various incorporated cities that participate in different CDC programs (these cities are called "participating cities"). Approximately one million of the County's more than ten million residents live in unincorporated areas.

Over 70% of the CDC's funding comes from the U.S. Department of Housing and Urban Development (HUD). The agency's four main activity areas are subsidized housing, housing development and preservation, community development, and economic development. In Fiscal Year 2016-2017, the agency has a budget of \$466 million and a total staff size of 581.

URBAN COUNTY PROGRAM DESCRIPTION

The CDC is the lead agency for the Consolidated Plan. It administers the County's CDBG, and HOME programs and the Los Angeles Homeless Services Authority (LAHSA) administers the ESG program for the CDC. The CDC comprises numerous divisions, each with its own area of responsibility. Those divisions most directly involved with implementation of the Urban County's housing and community development strategy include Community Development, Economic and Housing Development, Assisted Housing, and Housing Management.

As the largest city in the Los Angeles eligible metropolitan statistical area (EMSA), the City of Los Angeles manages the Housing Opportunities for Persons with AIDS (HOPWA) Program. The CDC aids with managing the program by taking part in the Los Angeles Countywide

HOPWA Advisory Committee. This committee advises the City on identification of the needs and priorities of people with HIV/AIDS.

Public Housing Program

The Housing Authority of the County of Los Angeles (Housing Authority) serves in Los Angeles County, administering both the Section 8 Housing Choice Voucher and Public Housing programs. The Section 8 Housing Choice Voucher program currently assists approximately 23,000 families through a partnership with over 13,000 property owners. The Public Housing program manages 3,229 units of public and other affordable housing throughout Los Angeles County.

Public Housing Program

Public Housing refers to specific developments owned or operated by the Housing Authority which leases units directly to families.

SECTION 8 PROGRAM

The Section 8 program offers tenant-based assistance. Participants find their own housing to rent and pay a portion of their income towards rent.

SERVICE AREAS

The geographic area covered by this AFH comprises that area served by the Community Development Commission of the County of Los Angeles (CDC) Community Development Block Grant Program (CDBG) as well as that area served by the Housing Authority of the County of Los Angeles (HACoLA). This is termed the "Service Area" in this AFH. Further, these two entities are provided funds from the US Department of Housing and Urban Development. Even taken together, these entities do not serve the entire County and other development activities undertaken by the CDC but not funded through federal sources of funds, which may be distributed county-wide, are part of the strategy taken in addressing fair housing goals identified in the AFH.

To explain this definition of service area further, the CDC has an Urban County designation for its CDBG program. This designation represents 47 smaller cities in the County, as noted below in Table I.1

Table I.1

Participating Cities in the Los Angeles Urban County

	r an incipating chief in the 2007 ingleton chiam country							
Agoura Hills	Commerce	La Cañada Flintridge	Monrovia	South El Monte				
Arcadia	Covina	La Habra Heights	Rancho Palos Verdes	South Pasadena				
Avalon	Cudahy	La Mirada	Rolling Hills Estates	Temple City				
Azusa	Culver City	La Puente	San Dimas	Torrance				
Bell	Diamond Bar	La Verne	San Fernando	Walnut				
Bell Gardens	Duarte	Lawndale	San Gabriel	West Hollywood				
Beverly Hills	El Segundo	Lomita	San Marino	Westlake Village				
Calabasas	Hawaiian Gardens	Malibu	Santa Fe Springs					
Cerritos	Hermosa Beach	Manhattan Beach	Sierra Madre					
Claremont	Irwindale	Maywood	Signal Hill					

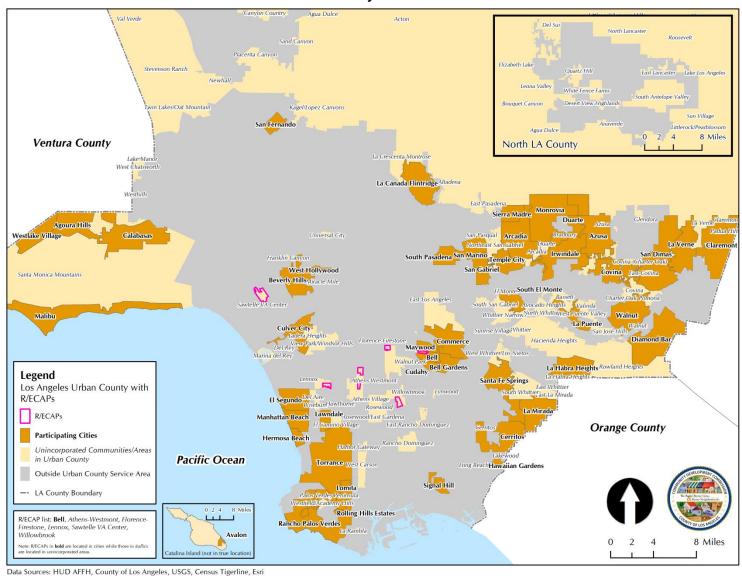
In addition, the Urban County also has a number of Census Designated Places (CDP), or unincorporated communities in the County, as noted in Table I.2 along with other Non-CDP areas that are unincorporated. In total, this represents only about 20 percent of the County's population.

Table I.2
Unincorporated Communities in the Los Angeles Urban County

	<u> </u>	munities in the Los		· ·
Acton	Del Aire	La Habra Heights	North Whittier	South Edwards
Agoura	Del Rey	La Rambla	Northeast San Gabriel	South El Monte
Agua Dulce	Del Sure	La Verne	Padua Hills	South San Gabriel
Altadena	Desert View Highlands	Ladera Heights	Palmdale	South Whittier
Anaverde	Duarte	Lake Hughes	Palos Verdes Peninsula	Stevenson Ranch (Santa Clarita)
Angeles National Forest	East Covina	Lake Los Angeles	Pearblossom/Llano	Sulpher Springs
Antelope Acres	East La Mirada	Lake Manor	Pellissier Village	Sun Village
Arcadia	East Lancaster	Lakewood	Pinetree	Sunrise Village
Athens Village	East Los Angeles	Lang	Placerita Canyon	Topanga
Athens-Westmont	East Pasadena	Lawndale	Pomona	Torrance
Avocado Heights	East Rancho Dominguez	Lennox	Quartz Hill	Twin Lakes/Oat Mountain
Azusa	East Whittier	Leona Valley	Rancho Dominguez	Universal City
Baldwin Hills	El Camino Village	Littlerock	Rolling Hills	Val Verde
Bandini Islands	El Monte	Littlerock/Juniper Hills	Roosevelt	Valencia (Santa Clarita)
Bassett	El Nido	Littlerock/Pearblossom	Rosewood	Valinda
Bouquet Canyon	El Porto	Llano	Rosewood/East Gardena	Valyermo
Bradbury	Elizabeth Lake	Long Beach	Rosewood/West Rancho Dominguez	Vasquez Rocks
Calabasas Highlands	Fernwood	Los Angeles	Rowland Heights	View Park/Windsor Hills
Calabasas Park	Florence-Firestone	Lynwood	San Clemente Island	Walnut
Canyon Country (Santa Clarita)	Forest Park	Malibu Bowl (Malibu)	San Francisquito Canyon/Bouquet Canyon	Walnut Park
Carson	Franklin Canyon	Malibu Lake	San Jose Hills	West Antelope Valley
Castaic	Glendora	Marina del Rey	San Pasqual	West Carson
Cerritos	Glenview	Mint Canyon	Sand Canyon	West Chatsworth
Charter Oak	Green Valley	Miracle Mile	Santa Catalina Island	West Puente Valley
City Terrace	Hacienda Heights	Miraleste	Santa Monica Mountains	West Rancho Dominguez
Claremont	Harbor Gateway	Monrovia	Saugus (Santa Clarita)	Willowbrook
Compton	Hawthorne	Monte Nido	Saugus/Canyon Country	Wilsona Gardens
Cornell	Hi Vista	Montrose	Sawtelle VA Center	Wiseburn
Covina	Kagel/Lopez Canyons	Newhall (Santa Clarita)	Soledad	
Covina (Charter Oak)	La Crescenta- Montrose	North Lancaster	South Antelope Valley	

Map I.1, presented on the following page, shows the participating cities, unincorporated Census Designated Places, and other unincorporated areas in the Urban County service area. This map also includes the Racially and Ethnically Concentrated Areas of Poverty (R/ECAPs) that are in the Urban County.

Table I.3 on page 6 shows R/ECAPs for the Urban County and Table I.4 A, following directly after, presents the fair housing goals, issues, and proposed achievements for the Urban County.



Map I.1
Urban County Service Area

Table I.3

Urban County Census Tracts Designated as

Racial or Ethnically Concentrated Areas of Poverty (R/ECAPs)

Community Name	Census Tract Number				
Athens/Westmont	06037600100				
Atnens/vvestmont	06037600303				
Bell	06037533601				
Florence/Firestone	06037532800				
Lennox	06037601700				
Sawtelle VA Center	06037701100				
Willowbrook	06037541400				

Table I.4 A below provides a list of the factors that have been identified as contributing to these fair housing issues pertaining specifically to the Urban County. These items are prioritized according to the following criteria:

- 1. High: Contributing factors that have a direct and substantial impact on fair housing choice, especially in R/ECAP areas and those impacting persons with disabilities, and are core functions of HACoLA or the CDC.
- 2. Low: Contributing factors that may have a direct and substantial impact on fair housing choice buy are not within the core functions of HACoLA or the CDC, or not specific to R/ECAP neighborhoods, or have a slight or largely indirect impact on fair housing choice. These contributing factors will be provided to other agencies in which their core functions are designed to meet these needs. The CDC will create a matrix during the five-year term, 2018-2023, to determine which plans, policies, funding etc. can address the contributing factors by the other agencies and how the AFH goals can be coordinated with them in the future where appropriate.

Based on these contributing factors that are deemed high priorities, the CDC has proposed a series of goals and actions designed to address fair housing issues in the service area. These issues, and the goals that seek to address them, are listed below.

Table I.4 A County of Los Angeles: Assessment of Fair Housing Fair Housing Goals, Issues, and Proposed Achievements: CDC Urban County

Fair Housing Goal	Contributing Factors	Fair Housing Issue	Priority	5-Year Goal	Metrics, Milestones, and Timeframe for Achievement	Investment Type
Enhance accessible facilities and	Barriers to mobility	Disparities in Access to	High	Perform 20 curb cut projects serving 50,000 people	Perform five (5) curb cut projects per year serving 10,000 people. This will consist of upgrading, installing, or replacing sidewalks to improve accessibility for persons that are disabled.	Placed Based Participating Cities
infrastructure for persons with disabilities	,	Opportunity		Perform 10 public facility projects	Perform two (2) public facility improvement projects per year to either City Halls or Parks to improve accessibility for persons that are disabled.	Placed Based Participating Cities

Discussion: The provision of accessible sidewalks, parks and city halls for persons with disabilities has been a significant issue, as reported from the Disability and Access Focus Group, per HUD data, and per local data. This issue was also raised by members of the general public during the Community Meetings.

Fair Housing Goal	Contributing Factors	Fair Housing Issue	Priority	5-Year Goal	Metrics, Milestones, and Timeframe for Achievement	Investment Type
Promote more affordable housing for special needs populations	Lack of affordable housing in a range of sizes	Segregation Disparities in Access to Opportunity Disproportionate Housing Needs	High	900 housing units	Issue funding through affordable housing Notice of Funding Availability that targets the production of affordable housing for Special Needs populations, including Homeless, Chronically Homeless, Homeless Veterans, Mentally III, HIV/AIDS, Developmentally Disabled, and Frequent Users of the County's Health and Mental Health systems. Allow for a range of unit sizes in funded projects and allow for new construction and rehabilitation projects. Work with the Department of Regional Planning to evaluate density bonus requests and record affordability covenants on density bonus units. Also, use Land Use Initiatives that will increase affordable units such as the Marina del Rey Affordable Housing Policy, which applies to the Urban County.	Placed Based and Mobility

Discussion: The demand for more affordable housing comes from many sectors throughout the LA County Service Area including but not limited to the disabled, elderly, transgendered, or racial and ethnic communities as evidenced by focus groups, survey responses, HUD data, and local data. The investment decision making process should consider the location of new or rehabilitated housing units. New construction and rehabilitation projects should be directed toward higher opportunity areas.

Fair Housing Goal	Contributing Factors	Fair Housing Issue	Priority	5-Year Goal	Metrics, Milestones, and Timeframe for Achievement	Investment Type
Enhance accessible housing and supportive services to persons with disabilities	Lack of sufficient accessible housing in a range of unit sizes	Disparities in Access to Opportunity	High	125 housing units	Require construction of accessible units (mobility and sensory) at twice the requirement of ADA and California Building Code. Units will be certified by California Access Specialists and listed on the Los Angeles County Housing Resource Center website. Require that senior units be constructed to meet Universal Design requirements, which includes accessibility features.	<u>Mobility</u>
	Barriers to mobility	Segregation Disparities in Access to Opportunity	High	Provide annual funding with HPI funds. Renew contract in December 2020.	Fund the Los Angeles County Housing Resource Center in order to provide an accessible website and call center that can assist persons with disabilities in locating units with accessibility features.	Place based
	Lack of sufficient publicly supported housing for persons with HIV/AIDS	Disparities in Access to Opportunity	High	50 housing units	Include HIV/AIDS as a unit type that is eligible for funding under the affordable housing Notice of Funding Availability.	Mobility
	Land use and planning decisions restrict fair housing choice for persons with disabilities and affordable housing in general	Segregation Disparities in Access to Opportunity Disproportionate Housing Needs	High	Identify any policy changes and work with Regional Planning and Cities to address.	Continue to review Housing Element and other plans as well as planning decisions for inconsistencies with land use and State law regarding affordable housing including for person with special needs in Year 1. In Years 2-5, work with Agencies by holding meetings/trainings/discussions to make any necessary improvements to the plans and policies.	Place based- Unincorporated Areas All Participating Cities R/ECAPS

Discussion: The provision of housing and housing related services to persons with disabilities has been a significant issue, as reported from the Disability and Access Focus Group and the general public during Community Meetings, and Resident Advisory Board Meetings, as well as HUD data and local data. There is not a sufficient number of affordable and accessible housing units available. This is further complicated by land use and planning decisions that hinders affordable housing and fair housing choice for persons with disabilities. See Section IV of this report for further detail of housing element compliance and whether any cities contribute to fair housing issues.

Fair Housing Goal	Contributing Factors	Fair Housing Issue	Priority	5-Year Goal	Metrics, Milestones, and Timeframe for Achievement	Investment Type
Promote healthy communities	Presence of lead poisoning exposure	R/ECAPs Disparities in Access to Opportunity Disproportionate Housing Need	High	Review 820 homes and businesses for the presence of lead-based paint. Ensure all homes are lead safe when performing rehab activities	The CDC will continue to implement HUD Lead Based Paint Regulations (Title X), which requires federally funded rehabilitation projects to address lead hazards by procuring with Certified Lead Consultants to conduct testing on all CDC existing loan and grant commercial and housing rehabilitation programs. The Lead Consultants will review 164 homes and commercial buildings for the presence of Lead-Based Paint each year (Years 1-5) Additionally, a Lead Abatement Program is offered to address hazardous materials including lead based paint, asbestos, mold, and other environmental hazards. This Program is also offered to first time homebuyers to assist in addressing lead based paint hazards at the close of escrow. First-time homebuyers participating under the HOME-funded Home Ownership Program (HOP) will have lead-based paint inspections and clearance reports for all homes built before 1978	Place based- Unincorporated Areas Participating Cities R/ECAPS
	There are significant disparities in the proportion of members of protected classes experiencing substandard housing when compared to the total population.	R/ECAPS Disproportionate Housing Needs	High	750 housing units will be assisted.	Loans, grants, and handyworker assistance will be provided to residents to repair their homes so that they are brought up to standard condition and meet health and safety standards. Repairs can include, but are not limited to, roofing, electrical, plumbing, and lead based paint hazard measures. Handyworker programs will consist of minor repairs. 150 housing units will be assisted per year.	Place based- R/ECAPS and adjacent unincorporated areas
	Noise Pollution due to plane traffic from Los Angeles International Airport (LAX)	R/ECAPs and other areas near LAX Disproportionate Housing Need	High	Complete 570 single-family and 375 multifamily grants with CDBG Complete 1,055 singlefamily or multifamily grants with other funding	Provide for the preservation of affordable single- and multi-family housing within the Athens and Lennox Area Airport Noise Compatibility Program. Complete 114 single- and 75 multi-family grants with CDBG. Use CDBG funds for code violation correction and leverage \$7.5 million from Los Angeles World Airports (LAWA) to sound mitigate properties in conjunction with Lennox Health and Safety, RSIP 5-Year plan. FAA/LAWA & CDBG funding requirement to sound insulate 2,000 dwelling units is estimated to cost \$98 million. CDBG funds represent 5%	Place based- Athens-Westmont Lennox

					or \$4.9 million of the above figure.	
Promote healthy communities (continued)	Poor land use and zoning situating sources of pollution and environmental hazards near housing	R/ECAPs Disparities in Access to Opportunity Disproportionate Housing Needs	High	1. Continue 500 feet policy for the 5-year Consolidated Plan period. Train participating cities on policy in Year 1.	Continue policy in the Notice of Funding Availability that applicants that propose projects within 500 feet of a freeway will not qualify for funding such as HOME Partnerships Investment and other applicable funding. Train participating cities in Year 1 to consider implementing the policy within their jurisdictions.	Place based- Unincorporated Areas All Participating Cities R/ECAPS
		R/ECAPs Disparities in Access to Opportunity Disproportionate Housing Needs	High	Identify any policy changes and work with Regional Planning and Cities to address.	Review Housing Element and other plans for inconsistencies with land use and environmental hazards in Year 1. In Years 2-5, work with Agencies by holding meetings/trainings/discussions to make any necessary improvements to the plans.	Place based- Unincorporated Areas All Participating Cities R/ECAPS
	Access to quality healthcare	R/ECAPs Disparities in Access to Opportunity Disproportionate Housing Needs	High	Serve 600 people	A Community Clinic will serve 60 low- and moderate-income persons in unincorporated and R/ECAP areas each year. The clinic will offer services such as wellness visits and school physicals, women's health services, STD testing, health maintenance guidance, primary care visits, prenatal exams, pediatric care, and mental health services.	Place based- R/ECAPS: Athens-Westmont Florence/Firestone Willowbrook
	Food insecurity Access to healthy and nutritious food options	R/ECAPs Disparities in Access to Opportunity	High	Assist 6,000 people	Food Distribution & CalFresh Applicants Outreach Project. Assist 1,200 people each year. This program will provide fresh and non-perishable foods to low- and moderate- income individuals and families to increase their health outcomes. In addition, participants will be assisted in accessing resources for food assistance.	Place based- R/ECAPS: Athens-Westmont Florence/Firestone Willowbrook

Discussion: The R/ECAP areas throughout the Los Angeles County Service Area tend to have substantive public health issues, such as noise pollution, toxic emissions or other environmental hazards, as evidenced by HUD data and local data. it remains important to educate our clientele about the risks of such exposures. These health issues were made apparent in community input and health-related research in LA County. Planning and zoning regulations may have contributed to this problem, so it is important that we review the local planning and zoning issues for those areas that are in or near the R/ECAPs. We also need to assist in making access to healthy food choices easier, take the initiative to conduct outreach to the community, and resolve our food deserts by increasing access to healthy foods. To address noise pollution in R/ECAPs, we will need to assist homeowners and owners of multi-family units with sound insulation improvements.

Fair Housing Goal	Contributing Factors	Fair Housing Issue	Priority	5-Year Goal	Metrics, Milestones, and Timeframe for Achievement	Investment Type
	Location and access to local			Assist 450 businesses	Technical Assistance Program. Serve 90 businesses per year with technical assistance to improve their operations.	Place based- Florence/Firestone
	businesses, especially in economically depressed areas	Disparities in Access to Opportunity	High	Assist 10 businesses	Second Districtwide Community Business Revitalization Program. Façade improvements to businesses. The program targets businesses in low- and moderate- income unincorporated and R/ECAP areas. Assist two (2) businesses per year.	Placed Based- R/ECAPS and other primarily low- and moderate income unincorporated areas
Enhance and create viable communities	Lack of Information on Affordable Housing	R/ECAPS Segregation	High	Maintain and execute two 1 year contract renewals with Emphasys Software to manage websites in LA County, City of LA, and Pasadena to keep contract through Dec. 2020. Seek funding authority to execute new sole source contract in 2020	Attend affordable housing events to distribute information to the public and developer communities, host stakeholder meetings for County affordable housing initiatives and available sources of funds for development of affordable housing, and support the efforts of the Southern California Association of Nonprofit Housing. Engage in Countywide efforts to market the on-line Los Angeles County Housing Resource Center (housing.lacounty.gov) through on-line links, and wide distribution of flyers at community events, landlord tradeshows, and any specialized citizen information fair or event. Expand marketing to include partner websites in Los Angeles and Pasadena. Provide toll-free bilingual call center with TTY number, and Section 508 Accessible website. Require all CDC funded projects to register on website.	Places Based Mobility
	Increasing R/ECAPs Segregation Segregation		High	50 housing units	Develop target program for the production of both affordable rental for racial and ethnic minorities in areas with low instances of minorities. 10 units per year.	<u>Mobility</u>
				Oversee lease up of 128 affordable units in unincorporate d areas with low instances of minorities within 5 years.	The CDC will oversee leasing of affordable rental units in areas such as West Hollywood (HOME-funded and bond financed units) and Marina del Rey (land use restrictions under the Marina del Rey Affordable Housing Policy. The County has also funded projects in Santa Monica.	<u>Mobility</u>

Discussion: Enhancing and creating viable communities throughout the LA County Service Area is strongly desired by many throughout the service area. Community input, HUD data, and local data were clear on this point. Implementation barriers include lack of investment or business assistance and segregation in some parts of the service area in the R/ECAP areas as well as information on affordable housing and the segregation of some areas of the service area.as well as the availability of information on affordable housing.

Fair Housing Goal	Contributing Factors	Fair Housing Issue	Priority	5-Year Goal	Metrics, Milestones, and Timeframe for Achievement	Investment Type
				Serve 1,150 households per year. Collect five years of data to determine patterns of discrimination affecting mobility.	Serve 230 households per year with investigation of alleged violations of fair housing law. Counseling and/or cases will be opened or referred to other agencies. Annually report where they currently live, where the alleged infraction occurred, protective class, and issue code (type of discrimination, etc.). This data will be collected to determine patterns of discrimination affecting mobility. This will allow us to target resources as necessary either during the five (5) year period or for the next AFH.	Place based and Mobility based
Promote understanding and knowledge of fair housing and ADA laws	Discrimination in private rental and homes sales markets	Disparities in Access to Opportunity Discrimination Segregation	High	Distribute 80,000 pieces of literature. Conduct 80 outreach and educational presentations/ workshops. Staff 100 fair housing information booths. Conduct 40 fair housing special media efforts Host 15 fair housing special events.	The following training activities will be held to bring awareness to fair housing issues affecting persons accessing the private rental and home sales markets: Distribute 16,000 pieces of literature per year. Conduct 16 outreach and educational presentations and workshops per year to inform special populations of their rights. Staff 20 fair housing information booths at community festivals and annual events. Conduct eight (8) fair housing special media efforts per year. Host three (3) fair housing special events per year.	Place based and Mobility based
	Lack of on-line fair housing material to distribute information	Disparities in Access to Opportunity	High	Ensure all websites that fall under the Los Angeles Urban County provide adequate information on fair housing.	Annually review content of on-line referral services and verify that content is adequate. This includes websites for all participating jurisdictions.	Place based and Mobility based

Access to financial services	Segregation R/ECAPs Disparities in Access to Opportunity Disproportionate Housing Needs	High	Conduct 5 outreach and educational presentations.	Conduct outreach and education on fair lending and what constitutes discriminatory lending, annually. Conduct one (1) outreach and educational presentation per year to private lenders. Also, use media, mailings, and other methods to enhance outreach and education.	Place based and Mobility based

Discussion: Consistent with previous Analysis of Impediments to Fair Housing Choice, the Los Angeles County Service Area continues to have challenges in its fair housing arena, per community input, HUD data, and local data. One of the most troubling are the persistence if discriminatory actions taken in the marketplace, primarily by private landlords and lenders. Further complicating this are the lack of knowledge and understanding of fair housing and ADA laws by both consumers and providers of housing.

Fair Housing Goal	Contributing Factors	Fair Housing Issue	Priority	5-Year Goal	Metrics, Milestones, and Timeframe for Achievement	Investment Type
Coordinate the AFH with other agencies' plans and programs to address contributing factors	Lack of coordination with other Planning Processes and Programs to address contributing factors	Segregation R/ECAPs Disparities in Access to Opportunity Disproportionate Housing Needs	High	Coordinate the AFH with other Agencies to address Contributing Factors that are in their area of influence Track progress annually in the Annual Action Plans	In Year 1, identify the agencies and their plans and funding, if any, that could address the contributing factors that are low priorities for the CDC due to them not being core functions of the agency. Provide those agencies with the contributing factors and determine if there is a need not being addressed or planned to be addressed with their plans or programs. In Year 2, explore if an unmet need can be addressed as an eligible activity under either the CDBG or HOME program. Also, determine if AFH actions can be coordinated with other agency plans and programs to address the unmet needs. Throughout the five year period, progress will be tracked in the Annual Action Plans.	Placed based and mobility

Discussion: There were several concerns through the community participation and consultation process that there is a lack of coordination in providing services in general. The CDC has determined that some contributing factors are low priorities due to them being core functions of other agencies such as the Metropolitan Transportation Authority or METRO for short or the Department of Public Health. The CDC is committed to inform these agencies of the identified contributing factors and determine if they are either addressing them, plan to address them, or if there are any unmet needs that may be filled with limited Federal funding available to the CDC. Also, determine of AFH actions can be coordinated with other agency plans and programs. A matrix will be developed and progress will be tracked and made available in the Consolidated Plan and Annual Action Plans.

Fair Housing Goal	Contributing Factors	Fair Housing Issue	Priority	5-Year Goal	Metrics, Milestones, and Timeframe for Achievement	Investment Type
Promote lower rates of crime in R/ECAP areas	Public safety concerns R/ECAPs	R/ECAPs	High	Serve 100 homeowners	Homeowners Fraud Prevention. This program will serve 20 low-income homeowners per year from being victims of fraud in the purchase of a home, equity transactions including identity theft; and in the purchase of household goods and services.	Place based – Athens/Westmont Florence/Firestone Lennox Willowbrook
			Serve 1,100 youth	Drug Prevention and Gang Intervention Program. Assist 220 youth per year with diversion activities such as recreational and educational activities.	<u>Place based –</u> Florence/Firestone, Lennox	
				Assist 168,450 people	Graffiti Removal Program in the City of Bell. Assist 33,690 people per year	Placed Based- City of Bell

Discussion: Public safety and anti-crime activities are in significant demand, as noted in several of the Community Meetings, particularly those held in R/ECAP areas, as well as crime statistics reported by the LA County Sheriff and HUD data. There were additional concerns related to hate crime research, particularly towards Muslims and gay communities.

Fair Housing Goal	Contributing Factors	Fair Housing Issue	Priority	5-Year Goal	Metrics, Milestones, and Timeframe for Achievement	Investment Type
Enhance Limited English Proficiency services in R/ECAP areas	Lack of LEP services	R/ECAPs Disparities in Access to Opportunity	High	Assess CDBG- funded agencies in R/ECAP areas that are in need of translation or interpretation services to serve their clientele. Provide services or funding to agencies for said services on an as needed basis.	Enhance LEP outreach to non-English speaking persons annually. In Year 1-2, agencies will be assessed for any need they may have to serve persons with limited English skills. In Year 3-5, the agencies will be supported on an as needed basis with either services or funding to provide needed translation or interpretation services.	Placed Based- Athens/Westmont Florence/Firestone Lennox Willowbrook City of Bell

Discussion: During the Focus Groups and identified in the surveys, HUD data, and local data, it was expressed that there is a lack of services in low-income areas to assist persons with limited English proficiency which severely narrowed access to available services.

The Housing Authority of the County of Los Angeles (HACoLA) has a significantly different set of cities comprising the Housing Authority service area noted in Table I.5 below. It also retains many of the unincorporated communities seen Table I.2 on page 4.

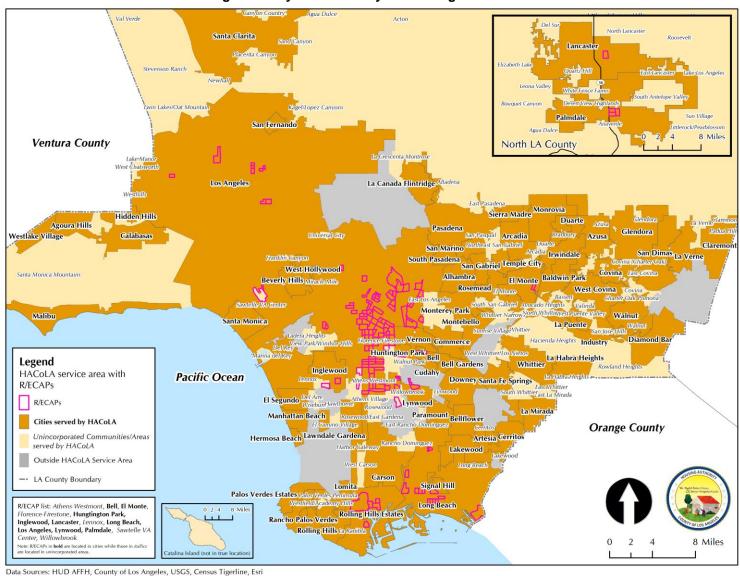
Table I.5
Cities Served by the Housing Authority of the County of Los Angeles

Agoura Hills	Commerce	La Canada Flintridge	Montebello	Santa Monica
Alhambra	Covina	La Habra Heights	Monterey Park	Sierra Madre
Arcadia	Cudahy	La Mirada	Palmdale	Signal Hill
Artesia	Diamond Bar	La Puente	Palos Verdes Estates	South El Monte
Avalon (Catalina Island)	Downey	La Verne	Paramount	South Pasadena
Azusa	Duarte	Lakewood	Pasadena	Temple City
Baldwin Park	El Monte	Lancaster	Rancho Palos Verdes	Vernon
Bell	El Segundo	Lawndale	Rolling Hills	Walnut
Bell Gardens	Gardena	Lomita	Rolling Hills Estates	West Covina
Bellflower	Glendora	Long Beach	Rosemead	West Hollywood
Beverly Hills	Hermosa Beach	Los Angeles	San Dimas	Westlake Village
Bradbury	Hidden Hills	Lynwood	San Fernando	Whittier
Calabasas	Huntington Park	Malibu	San Gabriel	
Carson	Industry	Manhattan Beach	San Marino	
Cerritos	Inglewood	Maywood	Santa Clarita	
Claremont	Irwindale	Monrovia	Santa Fe Springs	

Map I.2, presented on the following page, shows the service area for cities and unincorporated communities served by Housing Authority's 68 properties, public housing program locations, and locations of the Section 8 Vouchers. The R/ECAPs are presented in this map as well, indicating that a substantive set of R/ECAP areas exist in the HACoLA service area.

Following this map, Table I.6 shows R/ECAPs for the Housing Authority and Table I.4 B, following directly after, presents the fair housing goals, issues, and proposed achievements as they pertain to the HACoLA service area.

Finally, Map I.3 on page 30 shows the combined service area for the Urban County and HACoLA, with cities in dark orange and unincorporated areas in light tan.



Map I.2
Housing Authority of the County of Los Angeles Service Area

Table I.6
Housing Authority Census Tracts Designated as
Racial or Ethnically Concentrated Areas of Poverty (R/ECAPs)

Racial or Ethnically Concent	ated Areas of Poverty (R/ECAPs)				
Community Name	Census Tract Number				
Athens-Westmont	06037600100				
Athens-westmont	06037600303				
Bell	06037533601				
El Monte	06037433305				
Florence-Firestone	06037532800				
Liveties ton Dorle	06037533103				
Huntington Park	06037533104				
Inglewood	06037600602				
Lancaster	06037900806				
Lennox	06037601700				
	06037572800				
	06037571600				
	06037576401				
	06037573300				
	06037980007				
	06037576402				
Long Beach	06037575102				
	06037572500				
	06037573002				
	06037573003				
	06037573004				
	06037576302				
	06037576403				
	06037980015				
	06037232120				
	06037203100				
	06037117408				
	06037117407				
	06037221900				
	06037229200				
	06037228800				
	06037231710				
	06037238320				
	06037228210				
	06037228100				
	06037228420				
	06037221810				
	06037207102				
	06037231800				
	06037206050				
	06037242100				
Los Angeles	06037236204				
-	06037128210				
	06037209104				
	06037240200				
	06037240500				
	06037227020				
	06037208720				
	06037224420				
	06037128303				
	06037209820				
	06037239602				
	06037241110				
	06037238310				
	06037236202				
	06037243100				
	06037241120				
	06037226700				
	06037199700				
	06037208904				
	06037209300				

	06037205120
	06037204910
	06037294900
	06037296210
	06037206010
	06037207400
	06037206300
	06037294820
	06037226420
	06037221302
	06037224010
	06037222700
	06037224410
	06037212202
	06037199120
	06037221303
	06037204420
	06037980010
	06037241300
	06037205110
	06037206200
	06037134305
	06037228710
	06037229300
	06037224320
	06037120103
	06037221710
	06037221820
	06037222600
	06037294830
Los Angeles	06037117405
Los Angeles	06037231900
(continued)	06037232110
	06037190801
	06037228600
	06037228900
	06037229410
	06037231100
	06037231220
	06037239502
	06037239701
	06037239801
	06037240010
	06037237102
	06037237720
	06037239201
	06037207101
	06037204410
	06037240800
	06037241001
	06037241001
	06037242000
	06037113103
	06037226410
	06037209403
	06037120107 06037224600
	06037227010
	06037228220
	06037192700
	06037221500
	06037265303
	06037265303 06037208902
	06037265303 06037208902 06037209102
	06037265303 06037208902

Lypyrood	06037540202
Lynwood	06037540201
	06037910402
Palmdale	06037910403
	06037910501
Sawtelle VA Center	06037701100
Willowbrook	06037541400

Table I.4 B below provides a list of the factors that have been identified as contributing to these fair housing issues pertaining specifically to the HACoLA service area. These items are prioritized according to the following criteria:

- 1. High: Contributing factors that have a direct and substantial impact on fair housing choice, especially in R/ECAP areas and those impacting persons with disabilities, and are core functions of HACoLA or the CDC.
- 2. Low: Contributing factors that may have a direct and substantial impact on fair housing choice buy are not within the core functions of HACoLA or the CDC, or not specific to R/ECAP neighborhoods, or have a slight or largely indirect impact on fair housing choice. These contributing factors will be provided to other agencies in which their core functions are designed to meet these needs. The CDC will create a matrix during the five-year term, 2018-2023, to determine which plans, policies, funding etc. can address the contributing factors by the other agencies and how the AFH goals can be coordinated with them in the future where appropriate.

Based on these contributing factors that are deemed high priorities, HACoLA has proposed a series of goals and actions designed to address fair housing issues in the service area. These issues, and the goals that seek to address them, are listed below.

Table I.4 B
County of Los Angeles: Assessment of Fair Housing
Fair Housing Goals, Issues, and Proposed Achievements: HACoLA Service Area

Fair Housing Goal	Contributing	Fair Housing Issue	Priority	5-Year Goal	Metrics, Milestones, and	Investment Type
	Public safety concerns	R/ECAPs Disproportionate Housing Needs	High	1. Annually 2. Hold 15 meetings in five (5) years 3. Hold 120 meetings in five (5) years.	1. Continue to engage in community policing through Community Policing Teams (CPTs). 2. The CPTs meet quarterly and ascertains the crime prevention needs of the housing sites. 3. CPTs hold monthly Task Force by 2 service areas with the respective Area Manager and Counsel to monitor progress in crime prevention and addressing public safety concerns.	Place based
	Violent and drug related crime in public housing	R/ECAPs	High	1. Annually 2. Hold 15 meetings in five (5) years	Continue with Crime Prevention Unit and crime reduction programs. Convene meetings quarterly and report statistics on progress in keeping sites safe.	Place based
Promote lower rates of crime	Minority and low- income communities experience higher rates of crime and violence	Segregation Disparities in Access to Opportunity	High	1. Annually	Provide training and technical assistance to law enforcement agencies, County and City departments, and other housing authorities annually.	Place based
	Criminal activity in public housing facilities	R/ECAPS Disparities in Access to Opportunity	High	1. Annually 2. Hold 15 meetings in five (5) years	Continue Crime Prevention Through Environmental Design (CPTED) measures currently in place at HACoLA including installation of CCTV systems. Convene quarterly meetings with the CPT and CPTED staff to monitor progress and report on accomplishments quarterly.	Place based
	Juvenile crime activity	R/ECAPs Segregation	High	1. Annually 2. Hold 15 meetings in five (5) years	Continue Juvenile Justice Crime Prevention Act (JJCPA) activities throughout the year. Convene meetings to monitor progress and report on accomplishments quarterly.	Place based
	Rising crime statistics for burglary, theft and drug related crimes	R/ECAPs	High	1. Annually 2. Annually	Provide enhanced security measures as needed at public housing facilities including installation of CCTV systems. Review security contracts annually.	Place based

Discussion: Public safety and anti-crime activities are in significant demand, as noted in several of the Community Meetings, particularly those held in R/ECAP areas, as well as crime statistics reported by the LA County Sheriff and HUD data. Additional research points to the troubling presence of hate crimes in LA County. Many people wanted to know where the sheriff was during the Community Meetings, wishing that their voices were heard by the sheriff. Transcripts of those hearings have been prepared and submitted to the Sheriff. People also addressed the notion that there was little done to respond to their concerns in the past.

Fair Housing Goal	Contributing Factors	Fair Housing Issue	Priority	5-Year Goal	Metrics, Milestones, and Timeframe for Achievement	Investment Type
	Increase independence for the elderly or families with disabilities Increase independent living arrangements for people with disabilities	Disparities in Access to Opportunity Disproportionate Housing Needs	High	1. Annually 2. Annually 3. Annually 4. Annually	Apply for additional Resident Opportunity and Self Sufficiency (ROSS) grants annually. Continue to implement assisted living waiver program (ALWP) as state funding permits at senior sites. Currently the ALWP has been implemented at South Bay Gardens, Orchard Arms, and Lancaster Homes housing developments. Monitor progress and report annually. Continue to provide reasonable accommodations through HACoLA's Reasonable Accommodation request procedures. Monitor progress and report annually.	Mobility
				1. Annually	Continue to implement current review and approval of reasonable accommodations practices and track all ADA requests.	Place based
Enhance accessible housing and supportive services to persons with disabilities	Lack of sufficient accessible housing in a range of unit sizes	Disparities in Access to Opportunity	High	1. Conversion/ Rehabilitation activities to benefit a minimum of 6,500 units in five (5) years 2. Annually	Promote conversion activities to benefit a minimum of 1,300 units annually to include accessibility features of existing ADA units and non-ADA units in a range of sizes for persons with disabilities annually as funding permits. Monitor progress and report annually.	Mobility
	Lack of programs to support people with disabilities to adapt to their housing	Disparities in Access to Opportunity	High	1. Annually	Conduct mobility workshops for residents (ex: fall prevention, alert systems) throughout the year. Keep record of workshops.	Place based
	People with disabilities becoming homeless	Disparities in Access to Opportunity Disproportionate Housing Needs	High	1. Annually and as needed	Partner with other County agencies to identify housing prior to a resident or applicant becoming homeless and make referrals.	Place based
	Barriers to mobility	Segregation Disparities in Access to Opportunity	High	1. Annually	Utilize the Green Physical Needs Assessment (GPNA) to address barriers to mobility annually as funding permits.	Place based
	Lack of mental health services for school age children of public housing	Disparities in Access to Opportunity	High	Provide services to 100 residents annually	Continue to connect residents with resources including Department of Mental Health case management and services provided HACoLA case managers on-site.	Place based
	Barriers to accessing transportation services	Disparities in Access to Opportunity	High	1. Update information annually	Provide residents with transportation information on the HACoLA website regarding available mobile applications, and transportation websites.	Place based

Fair Housing Goal	Contributing Factors	Fair Housing Issue	Priority	5-Year Goal	Metrics, Milestones, and Timeframe for Achievement	Investment Type
	Access to transportation for seniors and disabled	Segregation Disparities in Access to Opportunity Disproportionate Housing Needs	High	Update and Provide information annually	Provide transportation information to residents at Resident Council Forum meetings and include this information in the HACoLA LINK Newsletter annually.	Place based

Discussion: The provision of housing and housing related services to persons with disabilities has been a significant issue, as reported from the Disability and Access Focus Group, as well as during Community Meetings, and Resident Advisory Board Meetings. There is not a sufficient number of affordable accessible housing units available, per community input and HUD and local data. Both the CDC and the HACoLA will devote additional resources to this need.

Fair Housing Goal	Contributing Factors	Fair Housing Issue	Priority	5-Year Goal	Metrics, Milestones, and Timeframe for Achievement	Investment Type
Create viable communities	Access to affordable internet	Disparities in Access to Opportunity	High	1. Annually 2. Annually 3. Annually	Continue to expand cable/internet access to housing development sites, as funding permits, annually. The Housing Authority currently has cable/internet access at three (3) housing developments: Carmelitos, Whittier Manor, and Herbert. Continue to provide computer/internet access at HACoLA's largest sites in the Family Learning Centers at Nueva Maravilla, Harbor Hills and Carmelitos. When providing Project-Based Voucher funding to developers that Construct or Rehabilitate Affordable Housing Developments, continue to require, as mandated by the Federal Communications Commission and the U.S. Department of Housing and Urban Development, Broadband Infrastructures that permits residents to acquire low cost internet services.	Place based

Discussion: The desire to enhance as well as create viable communities throughout the LA County Service Area is a strong desire by many throughout the service area. Part of this is due to the lack of Community Reinvestment Act investments in lower income areas (per CRA data analysis), lack of mortgage lending in lower income areas and with racial and ethnic minorities (per HMDA data analysis). As well, public investments for such things as public parks, recreation centers and other public facilities is felt to be less in R/ECAP areas, as evidenced by the community input process of the AFH.

Fair Housing Goal	Contributing Factors	Fair Housing Issue	Priority	5-Year Goal	Metrics, Milestones, and Timeframe for Achievement	Investment Type
Promote healthy communities	Industries not in compliance with health regulations Pollution in Neighborhoods Illegal Dumping Proximity to environmental hazards, especially in communities of color	R/ECAPs Disparities in Access to Opportunity	High	Update information annually	Continue to facilitate environmental review process and adhere to state requirements and procedures. Refer residents to responsible agencies as needed and include information on HACoLA website.	Place based
	Food insecurity Access to healthy and nutritious food options	R/ECAPs Disparities in Access to Opportunity	High	Annually Seasonally and Annually	Continue to promote access to food assistance programs like CalFresh and Women, Infants, and Children (WIC) through the HACoLA LINK Newsletter and on the HACoLA website annually. Continue the Growing Experience Program that provides fresh produce at a low cost to residents and the local Long Beach community.	Place based
	Enhance adequacy of life skills (e.g. Housekeeping, healthy eating, financial management)	Disparities in Access to Opportunity	High	1. Hold 15 Resident Council Forum meetings in five (5) years; hold training seminars annually 2. Hold 15 Resident Council Forum meetings in five (5) years; hold training seminars annually 3. Hold life skills training as new residents are admitted, annually	1. Continue to provide training seminars to residents on life skills at the quarterly Resident Council Forum meetings and onsite resident meetings. 2. Continue partnerships with outside agencies to provide training seminars for Public/Affordable Housing residents. 3. Provide life skills training at New Resident Orientation.	Place based
	Enhance air quality within housing development sites	R/ECAPs Disparities in Access to Opportunity	High	1. Implemented Smoke-Free Policy effective July 1, 2014	Continue to enforce Smoke-Free policy in all developments (except South Bay Gardens where smoking is permitted in a specified open area that is at least 25 feet away from a Housing Authority building that is clearly labeled "Smoking"	Place based

		Designated Area"). Ensure that all residents, guests, visitors, vendors, contractors, and staff are in compliance with policy.	
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Discussion: The R/ECAP areas throughout the LA Service Area tend to have substantive public health issues. Whether that is through pollution, toxic emissions or other environmental hazards, it remains important to educate our clientele about the risks of such exposures. These exposures have come to light from extensive research of HUD and local data regarding healthy communities, explored in greater detail in Section IV. Furthermore, we must recognize our past role through planning and zoning that may have contributed to this problem. Hence, we need to review the local planning and zoning issues for those areas that are in or near the R/ECAPs. Furthermore, to assist in making access to health food choices easier, we must take the initiative and conduct outreach to the community and resolve our food deserts and increase access to healthy foods.

Fair Housing Goal	Contributing Factors	Fair Housing Issue	Priority	5-Year Goal	Metrics, Milestones, and Timeframe for Achievement	Investment Type
Promote more affordable and accessible housing	Instances of absentee/bad landlords	Disparities in Access to Opportunity Disproportionate Housing Needs	High	1. Annually 2. Annually	Continue to outreach and provide owner education workshops regarding subsidized rental programs, as well as tenant/landlord California laws Continue to enforce HUD regulations regarding owner suitability	Place based
	Access to affordable rental housing	Segregation R/ECAPs Disparities in Access to Opportunity Disproportionate Housing Needs	High	1. Annually 2. Annually 3. Annually	Promote conversion of units to include accessibility features of existing ADA units and non-ADA units annually. Utilize the GPNA to identify and assess ADA needs and implement as funding permits, annually Monitor and track the number of units and/or other accessibility features annually.	Place based
	Lack of availability of accessible housing options	R/ECAPs Disparities in Access to Opportunity Disproportionate Housing Needs	High	1. Annually 2. Annually	Continue and enhance resident services programs for all residents, including specialized programs for youth. Continue to provide college scholarships through the Community Development Foundation (CDF) annually.	Place based
	Enhance place based investments	Disparities in Access to Opportunity	High	1. Annually 2. Annually 3. Annually	Preserve public housing by continuing to address GPNA recommendations annually as funding permits. Expand accessibility programs for public housing tenants. Apply for available funding opportunities for additional rental assistance vouchers and explore ways to increase housing opportunities for target populations (i.e. Homeless, Special Needs Families).	Place based

Discussion: The demand for more affordable and accessible housing comes from many sectors throughout the LA County Service Area as evidenced through the community input process of the AFH, as well as analysis of HUD and local data. Whether the disabled, elderly, transgender, or racial and ethnic communities, the County needs to have in place additional affordable and accessible housing. It is of particular merit that the location of where these new housing units are constructed, or housing is renovated, should play in the investment decision process. New construction should be directed to higher opportunity areas, with selected renovation in R/ECAP areas.

Fair Housing Goal	Contributing Factors	Fair Housing Issue	Priority	5-Year Goal	Metrics, Milestones, and Timeframe for Achievement	Investment Type
	Enhance Section 504 to make it fair and equitable	Disparities in Access to Opportunity	High	Annually Update information annually	Provide all applicants the "Housing Authority's Process to Request a Reasonable Accommodation and/or Reasonable Modification" information form on the HACoLA website, to residents and in the application packet. Update annually the listing of ADA Units and accessibility features of housing sites on HACoLA's website.	Place based
	Lack of knowledge of Fair Housing and ADA laws	Disparities in Access to Opportunity	High	1. Annually	Continue to conduct ADA and Fair Housing training for all new employees annually.	Place based
Promote understanding and knowledge of fair housing and ADA laws	Disconnect in matching people with disabilities with the right housing resources	Disparities in Access to Opportunity	High	1. Annually 2. Update information annually 3. Update information annually	1. HACoLA will continue to provide a family that is disabled and requires specific accessible features, priority for vacant ADA units. HACoLA offers a vacant ADA unit first to current units and then to an eligible qualified applicant that requires the special features of the vacant unit. 2. HACoLA will provide all applicants the "Housing Authority's Process to Request a Reasonable Accommodation and/or Reasonable Modification" Information Form on the HACoLA website and in the application packet. 3. Update the listing of ADA Units and accessibility features of housing sites on HACoLA's website annually.	Mobility
	Inefficient process to assign accessible housing	Disparities in Access to Opportunity Disproportionate Housing Needs	High	1. Annually 2. Update information annually 3. As requested by applicants and residents, annually 4. As the need arises, annually	1. HACoLA will provide all applicants the "Housing Authority's Process to Request a Reasonable Accommodation and/or Reasonable Modification" information form on the HACoLA website and in the application packet. 2. Update annually the listing of ADA Units and accessibility features of housing sites on HACoLA's website. 3. HACoLA will continue to provide a family that is disabled and requires specific accessible features, priority for vacant ADA units. HACoLA offers a vacant ADA unit first to current units and then to an eligible qualified applicant that requires the special features of the vacant unit. 4. HACoLA will continue to require a signed	Place based

					Waiver Form from each resident that is housed in a unit with accessible features where the resident does not require a unit with such features. Pursuant to this waiver, a unit with accessible features can be assigned to a resident or applicant that is disabled as the need arises.	
Promote understanding and knowledge of fair housing and ADA laws (continued)	Discrimination in the private accessible rental markets	Segregation R/ECAPs Disparities in Access to Opportunity Disproportionate Housing Needs	High	1. Monthly 2. Annually 3. Annually	For Section 8 participants, continue to provide mobility counseling at voucher briefing sessions. For Section 8 participants, continue to provide access to enhanced Housing Navigation Resources Continue to provide and review information on the Housing Authority Website and briefing session regarding reporting Housing Discrimination.	Place based

Discussion: Consistent with previous Analysis of Impediments to Fair Housing Choice, the Los Angeles County Service Area continues to have challenges in its fair housing arena. One of the most troubling is the persistence of discriminatory actions taken in the marketplace, primarily by private landlords and lenders (as evidenced by community input received from the 2017 Resident Fair Housing Survey). Further complicating this are the lack of knowledge and understanding of fair housing and ADA laws by both consumers and providers of housing.

Fair Housing Goal	Contributing Factors	Fair Housing Issue	Priority	5-Year Goal	Metrics, Milestones, and Timeframe for Achievement	Investment Type
Enhance employment opportunities	Disparities in job readiness and educational achievement	R/ECAPs Disparities in Access to Opportunity	High	Provide services to 100 residents annually	Conduct job readiness training for public housing residents annually. Partner with Workforce Development, Aging, and Community Services (WDACS) to enhance collaboration on existing program efforts as well as design new initiatives for workforce readiness and employment opportunities.	Mobility

Discussion: One of the keys to empowerment is the ability to secure gainful employment, particularly that which pays a reasonable and livable wage. The CDC and the HACoLA are committed to assisting households in the LA County Service Area to secure this type of employment opportunity, either through job training, retraining, recruitment, and job retention. HUD data and maps showing the Labor Market Engagement Index show areas for improvement in engaging in the workforce for low-income areas and R/ECAPs (see Section IV of this report for further detail).

Fair Housing Goal	Contributing Factors	Fair Housing Issue	Priority	5-Year Goal	Metrics, Milestones, and Timeframe for Achievement	Investment Type
Facilitate access to proficient schools	Enhance place based investments	Disparities in Access to Opportunity	High	1. Annually 2. Annually 3. Provide services to 200 residents annually 4. Annually	Continue and enhance resident services programs for all residents, including specialized programs for youth. Continue to provide college scholarships through the CDF, annually. Continue to provide computer classes/labs, afterschool programs for youth, financial literacy, nutrition workshops, and enrichment activities at the HACoLA Family Learning Centers (FLC). Continue to convene the CDF annual Reality Check Conference where HACoLA youth are provided with scholarships,	Place based
					educational seminars, and skill development to assist them in achieving their goals.	
					T	
	Availability of scholarships, especially for Section 8 families	Disparities in Access to Opportunity	High	1. Annually	Continue to provide scholarships for residents as funding permits through the CDF.	Mobility

Discussion: A key issue to ensuring that future generations can ascend the latter to greater economic opportunity is the ability to have access to a good education. In many areas of the Los Angeles County service area, this remains a challenge. However, several issues related to substantive concerns for communities of color, as well as those in lower income neighborhoods, remain to be worked on, as noted above. HUD-provided data and maps show the School Proficiency Index as low-scoring in low-income and R/ECAP areas (see Section IV of this report for further detail).

Fair Housing Goal	Contributing Factors	Fair Housing Issue	Priority	5-Year Goal	Metrics, Milestones, and Timeframe for Achievement	Investment Type
Promote facilities and services for the homeless	Enhance programs to help at-risk homeless population	R/ECAPs Disparities in Access to Opportunity Disproportionate Housing Needs	High	1. Annually 2. Annually	Continue to receive referrals from Los Angeles Homeless Services Authority (LAHSA) to house homeless families and provide case management for these families to remain housed. As funding and regulatory requirements permit, continue to commit through a competitive Notice of Funding Availability, Project-Based Vouchers, to developers that target affordable housing development that will house special needs populations, such as at-risk of homeless and/or homeless populations.	Place based
	Homelessness prevention programs	Disparities in Access to Opportunity Disproportionate Housing Needs	High	1. Annually 2. Annually	Prioritize rapid rehousing and provide ancillary services through LAHSA coordinated with CDC and HACoLA. Using Measure H funding, continue to evaluate and expand the Homeless Incentive Program to entice landlords to rent available rental units to the homeless and homeless veteran's.	Place based

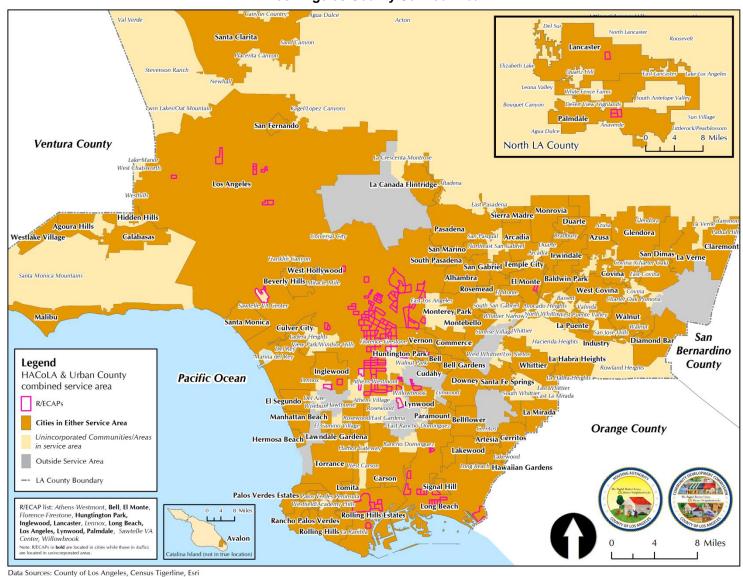
Discussion: The number of persons who are homeless in the Los Angeles County Service area has continued to expand over the years and was a topic discussed in the community input process of the AFH. It is a significant challenge due to the both housing and special needs services required of this sub-population. Still the LAHSA has the capacity and capability to address these challenges. The CDC and the HACoLA are committed to working with the LAHSA to ensure that these populations are addressed in a consistent and constant method and fashion.

Fair Housing Goal	Contributing Factors	Fair Housing Issue	Priority	5-Year Goal	Metrics, Milestones, and Timeframe for Achievement	Investment Type
Enhance transit services transit La	Access to transportation for parents and children	Disparities in Access to Opportunity	High	Update information annually	HACoLA will inform residents of resources and options for transportation on the HACoLA website.	Place based
	Lack of availability of bus passes	Disparities in Access to Opportunity	High	Update information annually	HACoLA will inform residents of resources and options for transportation on the HACoLA website. HACOLA website.	Place based

Discussion: Enhancing the public travel experience is another key aspect for householders, particular those residing in the R/ECAPs to secure enhanced public transit and be able to get to the jobs. The community input process was critical in understanding the importance of this goal, and analysis of HUD and local data confirms this.

Fair Housing Goal	Contributing Factors	Fair Housing Issue	Priority	5-Year Goal	Metrics, Milestones, and Timeframe for Achievement	Investment Type
Other fair housing goals	Lack of resources and services for working families (e.g., helping find housing for minorities)	Disparities in Access to Opportunity	High	1. Update information annually 2. Annually 3. Annually 4. Provide services to 200 residents annually	Continue to provide a current listing of housing units on the HACoLA website. Continue and enhance resident services programs for all residents, including specialized programs for youth. Continue to provide college scholarships through the CDF, annually. Continue to provide computer classes/labs, afterschool programs for youth, financial literacy, nutrition workshops, and enrichment activities at the HACoLA Family Learning Centers (FLCs).	Place based
	Low levels of parent involvement	Disparities in Access to Opportunity	High	1. Annually	Conduct outreach to parents with Limited English Proficiency and computer access annually.	Place based
	Access to affordable childcare	Disparities in Access to Opportunity	High	Provide services for 200 residents annually	Continue to refer residents to child care centers that provide services to low income families. HACoLA has child care centers in Harbor Hills, Nueva Maravilla, and off-site childcare centers through the Long Beach Head Start program and at the Bright Futures Child Development Center in South Los Angeles.	Place based

Discussion: There are several other concerns that we must consider in evaluation fair housing issues for the Los Angeles County Service area, brought to light through the community involvement process and analysis of HUD and local data. While these do not necessary fit well into any other category it in no way lessens their significant importance to promoting the economic vitality of the County.



Map I.3
Los Angeles County Service Area

PURPOSE AND PROCESS

The AFFH rule requires fair housing planning and describes the required elements of the fair housing planning process. The first step in the planning process is completing the fair housing analysis required in the AFH. The rule establishes specific requirements program participants must follow for developing and submitting an AFH and for incorporating and implementing that AFH into subsequent Consolidated Plans and Public Housing Agency (PHA) Plans. This process is intended help to connect housing and community development policy and investment planning with meaningful actions that affirmatively further fair housing.²

The new approach put in place by this rule is designed to improve program participants' fair housing planning processes by providing data and greater clarity to the steps that program participants must take to assess fair housing issues and contributing factors, set fair housing priorities and goals to overcome them, and, ultimately, take meaningful actions to affirmatively further fair housing. A goal of the AFFH rule is to make sure states and insular areas, local communities, and PHAs understand their responsibilities in the area of fair housing planning. As HUD works to foster effective fair housing planning, goal setting, strategies, and actions, it recognizes that the people who are most familiar with fair housing issues in cities, counties, and states are the people who live there and deal with these issues on a daily basis.

Local governments, PHAs, States, and Insular Areas must be involved in fair housing planning to ensure follow through on the obligation to affirmatively further the policies of the Fair Housing Act. These policies include the policy of ensuring that persons are not denied equal opportunities in connection with housing because of their race, color, national origin, religion, disability, sex, or familial status. They also include the policy of overcoming patterns of segregation and the denial of access to opportunity that are part of this nation's history. To be effective, fair housing planning must tackle tough issues. Fair housing planning affects the community as a whole, so all people in the community must have the opportunity to be at the table and participate in making those decisions.

The AFFH rule recognizes that local governments, PHAs, States, and Insular Areas have the responsibility to identify the nature and extent of barriers to fair housing and set goals for what can and should be done to address them. For this reason, the AFFH rule makes community participation an important part of the development of the AFH and subsequent planning to help ensure the integrity and, ultimately, the success of program participants' efforts to affirmatively furthering fair housing. In other words, subject to review by HUD, local governments, PHAs, States, and Insular Areas will identify the fair housing issues affecting their geographic area, develop planned solutions, and be accountable for resolving the problems using the solutions that they adopt.³

The introduction of the HUD's Assessment of Fair Housing tool (Assessment Tool) requires jurisdictions to submit their Fair Housing Assessments through an online User Interface. While this document is not that submittal, the Assessment Tool provides the organizational layout of this document.

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² https://www.hudexchange.info/resources/documents/AFFH-Rule-Guidebook.pdf

³ Affirmatively Furthering Fair Housing Rule Guidebook, Version 1, December 31, 2015, the U.S. Department of Housing and Urban Development, preface.

AFH METHODOLOGY

This AFH was conducted through the assessment of a number of quantitative and qualitative sources. Quantitative sources used in analyzing fair housing choice in Los Angeles County included:

- Socio-economic and housing data from the U.S. Census Bureau, such as the 2010 Census and the 2011-2015 American Community Survey;
- The 2017 HUD AFFH Database, which includes PHA data, disability information, and geographic distribution of topics;
- Housing complaint data from HUD;
- Home loan application data from the Home Mortgage Disclosure Act;
- Small business loans from the Community Reinvestment Act;
- Quarterly progress report data from the Housing Rights Center; and
- A variety of local data.

Qualitative research included evaluation of relevant existing fair housing research and fair housing legal cases. Additionally, this research included the evaluation of information gathered from many public input opportunities conducted in relation to this AFH, including the 2017 Fair Housing Survey, a series of fair housing forums, workshops, and presentations, the public review and related review workgroups.

As a result of detailed demographic, economic, and housing analysis, along with a range of activities designed to foster public involvement and feedback, the program participant has identified a series of fair housing issues, and factors that contribute to the creation or persistence of those issues. The issues that the collaborating agencies have studied relate to racially and ethnically concentrated poverty, segregation and integration of racial and ethnic minorities, disproportionate housing needs; publicly supported housing location and occupancy; disparities in access to opportunity; disability and access; and fair housing enforcement, outreach, capacity, and resources.

The AFH development process will conclude with a forty five-day public review period of the draft AFH, ending with a presentation and a final report. Specific narratives and maps, along with the entirety of this report created in the AFFH Assessment Tool, will be submitted to HUD via the on-line portal on or before October 4, 2017.

AREAS OF OPPORTUNITY

As a guide to aiding resource investments in the County, the research team developed single composite index representing a rating of Census tracts, which factors in variables concerning education, job and labor markets, housing, transportation, and environmental health. Those areas scoring a high index represent the areas with the greatest opportunity. These are physical places having desirable attributes, such as high-performing schools, availability of well-paying jobs, and clean air quality, among others. Areas with a low index represent areas with low opportunity, and are heavily populated with R/ECAP areas. The index is designed to better understand what an "area of opportunity" represents and what disparities in opportunity mean. Investments can be either place-based or to enhance mobility, but the opportunity index score

aids in helping us to better include an evaluation of equity and the distribution and access to opportunity within the larger community. In developing this index, HUD-provided data as well as local data have been incorporated as part of the methodology.

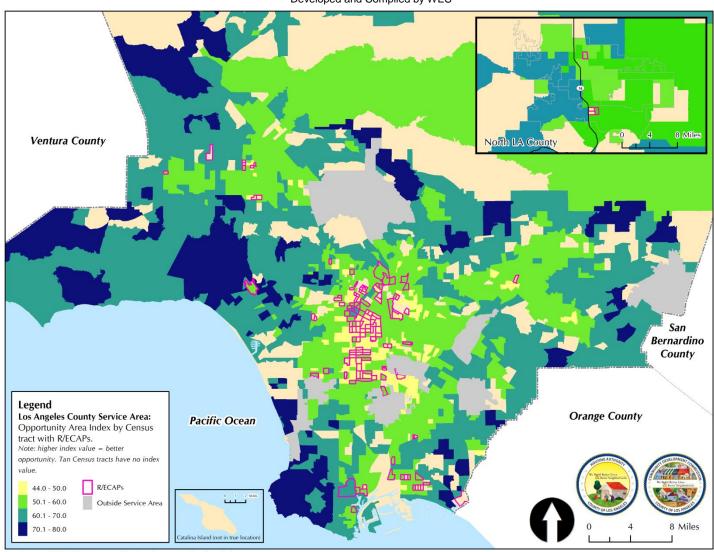
Variables in each of the five categories (Education, Economic, Housing, Transportation, and Health) were given equal weighting. The five categories were then compiled into one "master" opportunity index value, weighted such: 35 percent weight each to Education and Housing, 15 percent weight Economic, 10 percent weight to Transportation, and 5 percent weight to Health. Table I.7 below shows the factors incorporated in the development of this index.

Table I.7
Factors Considered in Areas of Opportunity
HUD Data, Census Database, Local Data

Education	Economic	Housing	Transportation	Health
School Proficiency Index	Job Proximity Index	Percent Occupied Housing Units	Transit Trips Index	Environmental Health Index
Percent of Persons Enrolled in School	Labor Market Engagement Index	Percent No Cost Burden	Low Transportation Cost Index	
High School Graduation Rate	Employment Rate	Percent No Overcrowding	Percent Walking to Work	
		Percent Non HAL Loans		

The index values are shown below in Map I.4. The lowest opportunity area index values (shown in yellow on the map) are in Central Los Angeles and to the southeast, near Westmont and Lynwood. Census tracts in the highest category of opportunity (those with values from 70.1 to 80 and shown in navy blue), can be found scattered throughout the peripheries of the county with large groupings near Rolling Hills and Rancho Palos Verdes, in the east of the county near Glendora and San Dimas, and near Santa Monica and Malibu. Note that no R/ECAPs are represented in areas with high levels of opportunity (any Census tracts with an opportunity value over 70.1). There are significant levels of opportunity in the moderately high opportunity areas, although three of these also show evidence of R/ECAP areas in downtown Los Angeles.

Map I.4
Opportunity Areas Index
Los Angeles County Service Area
Developed and Compiled by WES



Data Sources: HUD AFFH, County of Los Angeles, Census Tigerline, Esri

SECTION II. COMMUNITY PARTICIPATION PROCESS

The following section describes the community participation process undertaken for the 2017 Los Angeles County Assessment of Fair Housing.

A. OVERVIEW

This Assessment of Fair Housing promoted community participation through five main avenues: regional discussion groups; three sets of four focus groups each, aimed to address disability and access, education, employment and transportation, and healthy neighborhoods; Resident Advisory Board Meetings; community input meetings; and the 2017 Resident Fair Housing Survey. The process also included a final presentation. The regional discussion groups and focus groups were jointly sponsored with the City of Los Angeles and its housing authority and the County of Los Angeles and its housing authority, since both groups would be sought out and spoke with similar organizations.

The community participation process was designed to reach a broad audience, as a schedule of events, flyers for community meetings, and links to the fair housing survey were all made available on the Los Angeles County Community Development Commission's website. To reach more residents and increase participation numbers, the fair housing survey was given in several different languages, distributed to each of the Urban County's participating jurisdictions and mailed to thousands of residents. A summary of each focus group was posted to the CDC's website. A front-page summary of the community input meeting at Jackie Robinson Park was posted in the *Antelope Valley Press* on April 27, 2017, highlighting feedback from community members and spotlighting the community participation process.

Slides, transcripts, and sign-in sheets from the various input meetings are included in the Technical Appendix, a companion volume to this document. The following narrative explores the process for each of the community participation events.

B. REGIONAL DISCUSSION GROUPS

DEVELOPER GROUP

The Regional Developer Discussion Group held on January 18th, 2017 brought together a variety of people from the development community to the Assessment of Fair Housing for both the City and the County. Four main themes emerged as a result of the discussion: acknowledgement of performance of past incentives and investments, creation of actionable goals that are realistic and manageable, finding low-opportunity areas and how to turn them into high-opportunity areas, and segregation and its relation to people with disabilities.⁴

This discussion group brought together individuals from the following companies, organizations, and agencies:

⁴ These themes are not in priority order and represent the opinions of multiple individuals in attendance at the discussion group.

- Abode Communities
- ACOF
- Bonds Financial Consulting
- Breen Engineering
- Care1st Health Plan
- Clifford Beers Housing, Inc.
- Community Development Commission of the County of Los Angeles
- CSH
- Culver-Palms United Methodist Church
- Enterprise
- Habitat for Humanity, Los Angeles
- Housing Authority of the County of Los Angeles
- Housing Authority of San Bernardino
- Housing + Community Investment Department, City of Los Angeles
- Hollywood Community Housing Corp.
- JSCO
- LA Family Housing Corp.
- LINC Housing
- Long Beach Affordable Housing Coalition
- Masbuild Architecture + Design
- Mercy Housing California
- Metier
- New Capital, LLC
- New Directions for Veterans
- Nexus for Affordable Housing, Inc.
- Nishkian Chamberlain
- PATH Ventures
- SCRS-IL
- SKELKE International
- SRO Housing Corporation
- TELACU Residential Management, Inc.
- The John Stewart Company
- The Kennedy Commission
- The Midnight mission
- YM Architects

The discussion group identified several areas that need further deliberation such as looking at programs that worked in the past, what was able to get accomplished in the past and how can those programs be used or modified for the present. A few of the programs that were discussed were the Neighborhood Stabilization Program, First-time Homebuyers Program, and Housing Rehabilitation Program.

There was a stated need that there should be a marketing plan in place for developers so that they are able to access areas of opportunity for low-income residents that need housing.

The group further identified several concerns about the identification of areas of low-opportunity and transforming them into areas of high-opportunity, such as concern with articulating why the investment should go in that area, creating a balanced approach to development, issues of locality, the prohibition of funding for family housing in low-opportunity areas, and the mobility aspect of fair housing in the identification of areas of high-opportunities. There was discussion about a need for a balanced approach to development and concerns about Los Angeles experiencing a lot of growth and investment. There was also a concern noted about how new investments and improved housing and transit may lead to areas that are currently affordable to no longer be reasonable.

In the Developer Discussion Group, it was noted that not all of the HUD data is up to date and comprehensive, and that there is a need for more local input in finding the areas of concentration not identified by HUD by using public involvement. The group discussed taking stock in the City and the County of where there are areas of segregation and using that knowledge to update the HUD electronic tool. It was also verbalized that there were some past issues in terms of development of housing, roadways, and land use policies that may have led to the current segregation of various communities. There were strict zoning policies that limited the amount of housing for persons with disabilities. They mentioned a need to educate landlords, developers, and/or property managers on how to choose people for accessible units and creation of a waiting list. They also need to be accountable for showing people with disabilities the accessible units. There was also a discussion about educating people with disabilities on how to apply for accessible units and how to obtain those units.

Finally, the group discussed the need for outreach and education and that many of the older ways, such as newspaper posting, are outdated and the need to update to current technologies and better ways to connect with areas of disparity.

The Southern California Association of Nonprofit Housing sent out the invitation to the Developer Discussion Group, and the CDC supplemented their membership mailing list with other contacts.

GOVERNMENT GROUP

The Government Regional Discussion group held on January 18th, 2017, brought together individuals from the following government entities and agencies:

- Alhambra
- Avant Garde
- Arcadia
- Azusa
- Bell
- Bell Gardens
- Beverly Hills
- Carson
- CDD-GMU
- Cerritos
- Claremont
- County Regional Planning



- Diamond Bar
- Duarte
- El Segundo
- Gardena
- Hawaiian Gardens
- Housing Authority of the County of Los Angeles
- Housing + Community Investment Department, City of Los Angeles
- Housing Rights Center
- La Habra Heights
- La Puente
- Lawndale
- Lomita & San Fernando
- Los Angeles City Planning
- Los Angeles County
- Long Beach
- Maywood
- Monrovia
- Monterey Park
- Pasadena
- Rancho Palos Verdes
- San Dimas
- Signal Hill
- South El Monte
- South Gate
- South Pasadena
- Temple City
- The Whole Chile
- Walnut

The following list is a summary of the topics discussed at the Government Discussion Group meeting:

- Lack of jurisdictions that have RCAP/ECAP areas
 - Updated land use zoning polices see where restriction may be
 - Effects housing for persons with disabilities
 - Housing workforce stock
 - Help for homeless people
- Discussion on Community meetings
 - Where are they going to be held
 - Getting people to come
 - Outreach
 - Participating cities
- Discussion of surveys
 - Distribution
 - Who should take them-planning and zoning survey

- Survey process and distribution-paper, emails, website, survey monkey
- City of LA RCAP areas
 - Lack of current HUD data
 - Residents wanting to stay in areas that are high concentrations of minorities or poverty due to family, culturally based
 - People of other races and ethnicities moving into High poverty minority concentrated areas
 - People not wanting to move to higher opp areas due to family, etc.
- Social engineering in the past due to highway, designing of public housing in poor areas by private, federal, and local governments
 - Not repeat same mistakes through housing rights center
 - Provide education to landlords
 - Education of choice
 - o Give residents a choice and education on how to use that choice
 - Education on fair housing laws-residents/prop mangers/landlords
- Setting realistic goals and outcomes
- HRC- protect class different in state verses federal law
 - Concern with civil rights issues currently
 - o Discrimination against immigrants
 - Discrimination based on citizenship
 - o Can be discriminated under federal but not state law
 - Sings that re discriminatory-but not out right such as no running, no screaming, no fighting- means children
- Mortgages based on disparate impact-census areas
- Disparate impact on women-3 times the rent –single mothers-credit worthiness

Government officials were informed of the discussion group using emails and phone calls, and all cities within Los Angeles County and adjacent cities in Orange County were invited.

C. THE 2017 FAIR HOUSING FOCUS GROUPS

FOCUS GROUP OVERVIEW

The focus groups were chosen and formed based on the following estimated timeline of events: the new fair housing evaluation process will be introduced; key issues, concerns, and considerations of the AFH development process would be addressed; finally, recommendations or actions will be developed about which either the City or County (or both) could undertake to mitigate or overcome the fair housing issues and corresponding contributing factors. As a means to advertise the groups, invitations targeted a variety of groups and leveraged Eventbrite as a medium through which invitations were sent. These were followed up with phone calls and emails to encourage participation.

Overall, the fair housing analysis is comprised of seven topic areas, as follows:

- 1. Segregation analysis
- 2. An evaluation of racially and/or ethnically concentrated areas of poverty

- 3. Disparities in access to opportunity
- 4. Disproportionate housing needs
- 5. Publicly Supported Housing Analysis
- 6. Disability and access analysis
- 7. Fair housing enforcement, outreach, etc.

While all of these steps in the focus groups were addressed, they were designed to focus on just two: 1) disability and access; and 2) disparities in access to opportunity.

The HUD-provided data on persons with disabilities, by age and by type of disability, was also viewed and interpreted. This particular focus group was targeted specifically to the disabled activist community, so substantive knowledge about the experiences, trials, and tribulations of this community came to light during the three discussion sessions. Furthermore, this focus group was used to explicitly gather specific local data and information about persons with disabilities and the organizational, institutional, and governmental challenges faced by the community in the Los Angeles County Service Area.

While the HUD provided quantitative index data for each of the areas of opportunity⁵, such as access to Low Poverty; School Proficiency; Labor Market Engagement; Jobs Proximity; Low Transportation Costs; Transit Trips Index; and exposure to Environmental Health⁶, a substantive effort to solicit the contribution of local data, information, and local perspective was emphasized. Further, there were three focus groups devoted to access to opportunity: educational opportunities, employment and transportation opportunities, and healthy neighborhoods. All dealt with access to low poverty areas.

FOCUS GROUP PROCESS

The first choice made by the City and County of Los Angeles was to accept that, while each jurisdiction would conduct a Joint AFH with their respective Housing Authorities, many of the citizen involvement choices could be most effectively done in partnership, recognizing that several of the same groups would need to participate in the AFH process for each jurisdiction. Hence, this participatory process was born through the focus group process.

It included a series of three meetings of four focus groups each, with the meetings held in various locations throughout the City and County. These meetings were held January 10 and 11, February 1 and 2, and February 22 and 23, with the corresponding flyer advertisements included in Technical Appendix Section IV.A. In all cases, each meeting was designed to last two hours, with most audio recorded, with the accompanying transcripts noted in Technical Appendix Sections IV.A.1.v – IV.A.4.v.

The primary purpose of the focus group format was to conduct outreach and education, and solicit solutions to these key opportunity issues, particularly as it relates to qualitative perception of the importance of fair housing issues associated with each focus group topic area,

 $^{^{5}}$ These were indexed to either Census Tracts or Block Groups and could be mapped or presented as tabular data.

⁶ A higher score on each of the indices would indicate: lower neighborhood poverty rates; higher levels of school proficiency; higher levels of labor engagement; closer proximity to jobs; lower transportation costs; closer access to public transportation; and greater neighborhood environmental quality (i.e., lower exposure rates to harmful toxins).

and the contributing factors and prospective solutions to the fair housing issues that attendees to the focus groups expressed.

The rule defines a fair housing issue as the following:

a condition in a program participant's geographic area of analysis that restricts fair housing choice or access to opportunity, and includes such conditions as ongoing local or regional segregation or lack of integration, racially or ethnically concentrated areas of poverty, significant disparities in access to opportunity, disproportionate housing needs, and evidence of discrimination or violations of civil rights law or regulations related to housing. 24 C.F.R. § 5.152

The answers to these questions are designed to assist program participants in identifying significant contributing factors and related fair housing issues facing the jurisdiction and region. The rule defines a fair housing contributing factor as

a factor that creates, contributes to, perpetuates, or increases the severity of one or more fair housing issues. 24 C.F.R. § 5.152.

Contributing factors may be public or private policies, practices, or procedures that create, contribute to, perpetuate, or increase the severity of one or more fair housing issues. Those factors contributing to fair housing issues may differ depending on local context. For example, when assessing patterns of segregation the contributing factors will likely vary between different geographic areas of the jurisdiction and region.⁷

Under the AFFH rule, program participants must take four steps:

- 1) Identify fair housing issues and significant contributing factors;
- Prioritize contributing factors, giving highest priority to those factors that limit or deny fair housing choice or access to opportunity or negatively impact fair housing or civil rights compliance;
- 3) Justify the prioritization of contributing factors; and
- 4) Set priorities and goals to address the identified contributing factors and related fair housing issues.

This followed along the lines of an introductory focus group, a second meeting to flush out the fair housing issues and contributing factors, and a concluding focus group that summed up the process with a ranking of the contributing factors and concluded with a set of prospective recommendations. Audio recording was used in most of the meetings, and the second set of meetings used further documentation of breaking out into subgroups to discuss and document on flip-charts the fair housing issues and their contributing factors. The last meetings represented a summary and preliminary introduction of the fair housing issues and contributing factors represented to date.

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⁷ Affirmatively Furthering Fair Housing Rule Guidebook, Version 1, December 31, 2015, the U.S. Department of Housing and Urban Development, pages 105-107.

However, within each focus group, there was little effort to curtail the discussion, so in many circumstances, input from representatives of the advocates and interested parties participating in the focus group wound up crossing over into other areas of concern, such as the Educational Opportunity Focus Group talking about how access to education affected one's job opportunity, or the Disability and Access Focus Group discussing access to opportunity for persons with disabilities, and how they may or may not use the transit system.

The following narrative presents the factors and discussions present in each of the focus groups. The summary reports found in Section IV do not attempt to complete the priority and goal development process, but presents the status of the pertinent focus group effort and its contribution to the overall Assessment of Fair Housing process. For more information regarding these focus groups, including transcripts from the meetings, can be found in Technical Appendix Section V.A.

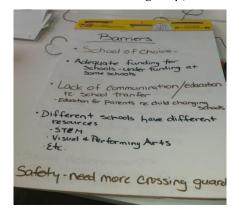
FOCUS GROUP SUMMARIES

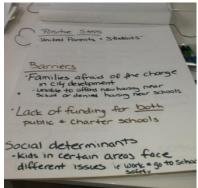
Education

The three Education Focus Group Meetings were held January 11, February 2, and February 23 at CDTech headquarters, southwest of Downtown Los Angeles. A number of contributing factors were discussed by attendees, including (but not limited to): the location of proficient schools, inadequate funding for schools both public and charter, lack of information on the transfer process for parents, and child safety when walking to school.

In the second focus group meeting, an attendee was concerned over state legislation relating to school of choice, where students have the opportunity to transfer to higher-performing schools, but there exists an inadequacy in funding for under-performing schools. This attendee was also concerned that all available education options were not communicated to parents, and that only the parents who were sophisticated and knowledgeable enough were able to take advantage of transfer and funding options for their children. The discussion also touched on funding for STEM (Science, Technology, Engineering, and Math) programs, and how many schools don't have the resources to focus on these classes. Safety was another major issue discussed, as one person felt that even making it to school was dangerous because they had to cross gang lines to do so.

Individuals attending these focus groups collected issues on two flipcharts, presented below. For more information on this focus group, see Section IV.D.





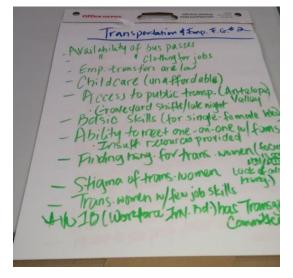
Transportation and Jobs

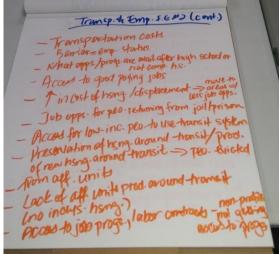
The three Transportation/Jobs Focus Group Meetings were held January 10, February 1, and February 22, 2017, at Strategic Action for a Just Economy (SAJE) Headquarters, southwest of Downtown Los Angeles. A number of contributing factors were discussed by attendees, including (but not limited to): lack of available clothing for employment, lack of resources and services for working families, stigma of transgender employees, and the prevalence of low skill workers. Individuals attending these focus groups assembled barriers on two flipcharts, presented below.

The transportation focus groups discussed the general lack of bus pass availability and expressed the desire for them to be reduced in cost. One attendee in the second focus group was concerned about the lack of reliable public transportation especially in the early morning hours, when a worker might have to travel a great distance to work a graveyard shift at a minimum wage job. With regards to this issue, the focus group recommended doubling the bus fleet, keeping families in areas near transportation, locating transportation near affordable housing, incentivizing employers to provide transportation, and continue the work of the MTA.

In the second jobs focus group, one attendee mentioned the concern over jobs that were located far from home, where a worker might have an early shift and have to travel a long way by public transit, and busses might not be operational at that hour of the morning. Another issue mentioned concerned the lack of proper work attire, and to that, the focus group recommended supporting efforts by non-profits (presumably to provide or make said clothing), review job rules (presumably regarding the dress code), and making clogging for employees more available. And many working mothers do not have access to affordable childcare, and the one who are working minimum wage jobs likely can't afford childcare, the focus group thought of the following possible solutions: somehow reducing the cost of childcare, providing universal childcare, increasing baselines to allow middle classes to be eligible for childcare subsidies, ensure all inventory of affordable housing should have space for childcare, and provide incentives to employers to provide childcare.

Individuals attending these focus groups collected issues on two flipcharts, presented below. For more information on this focus group, see Section IV.D.



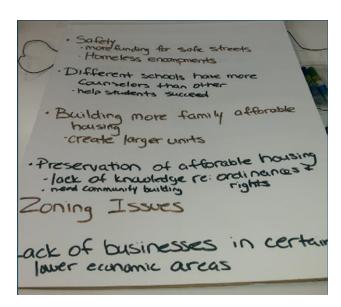


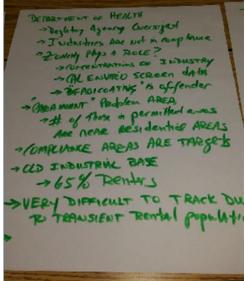
Healthy Neighborhoods

The three Healthy Neighborhoods Focus Group Meetings were held January 11, February 2, and February 23 at the Los Angeles County Community Development Commission offices in Alhambra. A number of contributing factors were discussed by attendees, including (but not limited to): location and access to grocery stores, illegal dumping, poor access to quality healthcare, and general public safety concerns such as safe streets and homeless encampments.

The focus group discussed matters pertaining to air pollutions and environmental hazards, pointing out that poor land use and zoning can often situate these unwanted toxins near housing and, often, near low-income or minority housing. The group hoped to see targeted efforts to bring industrial facilities into compliance with air quality and toxic emissions standards in communities highly burdened by air pollution and toxic emissions. The group also mentioned developing business support programs and incentives for toxic emitters to reduce emissions and pollutions; considering proximity to major sources of air pollution in land use planning; increasing bike and pedestrian improvements in disadvantaged communities and/or R/ECAP areas; collaboration across sectors to support policies that reduce greenhouse gas emissions; and a consideration of proximity to major sources of air pollution in land use planning.

Individuals attending these focus groups collected issues on two flipcharts, presented below. For more information on this focus group, see Section IV.D.



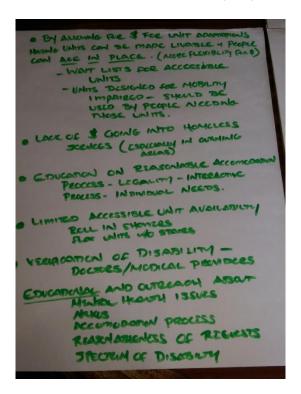


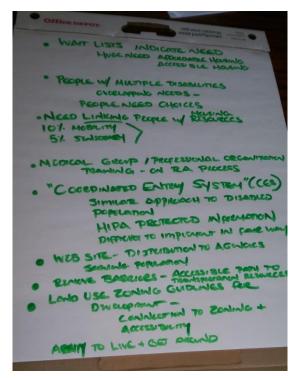
Disability and Access

Three Disability and Access Focus Group Meetings were held at the Legal Aid Foundation of Los Angeles and Bet Tzedek Legal Services on January 10, February 1, and February 22, 2017. A number of contributing factors were discussed by attendees, including (but not limited to): availability of accessible housing options, lack of knowledge of the ADA's Right to Reasonable Accommodation, overlapping needs of people with multiple disabilities, and a long waitlist for accessible and affordable housing.

In the second focus group, one comment addressed improving the intake process so that available housing is accessed by all the people that need it and enhancing the process for reasonable accommodations so that it is fair and equitable. Another topic that was discussed in this meeting involved the gentrifying downtown area of Los Angeles and that many homeless disabled persons were being displaced as a result.

Individuals attending these focus groups collected issues on two flipcharts, presented below. For more information on this focus group, see Section IV.D.





D. RESIDENT ADVISORY BOARD MEETINGS

The Resident Advisory Board (RAB) Meetings were held March 29-30 and were designed to solicit feedback from public housing residents as well as those using public housing vouchers. Public housing residents and Section 8 RAB members were notified of the meetings by mail. These meetings were held in Carmelitos, South Bay Gardens, and in Alhambra, located in the 1st, 2nd, and 4th Supervisorial Districts respectively. Two more meetings were held in West Hollywood and Palmdale on July 26, thus having held one RAB meeting in each Supervisorial District.

In the Carmelitos meeting, topics of safety and wheelchair accessibility were discussed by attendees. Several people mentioned feeling a lack of safety because of homeless people sleeping in bathrooms or laundry rooms. Some streets were seen as dangerous to seniors, disabled, and children. Confidentiality was brought up as a concern to reporting issues of other residents or a rental property, as several people mentioned not wanting to fill out the survey because of this. Another attendee mentioned criminals staying in the neighborhood and how the security crackdown on everyone else was unnecessarily burdensome. There was also a complaint about foreign languages spoken and not having an interpreter when taking up issues with the County. Finally, transportation was discussed and seen in a positive light in the community, as there seemed to be several transportation options in the neighborhood, making it convenient for residents.

The South Bay Gardens meeting was much shorter, and the conversation began with a discussion on displacement and how moving to a new location uprooted ties and familiarity to a community. The discussion then moved briefly to disability accommodation before arriving at budget concerns under the new presidential administration. One person mentioned President Trump's "skeleton budget" with proposed cuts to federal programs and social services to communities. The attendees were encouraged to write letters to the President and other elected officials to voice these concerns.

The meeting in Alhambra was initiated with a discussion on differences between Section 8 and Project Based Housing. After discussed these differences, the conversation moved on to safety and security. Residents talked about the perception of safety and were asked if they felt safe walking around their housing development. The residents then talked about rent increases and then complaints about substandard conditions in the places of residence. The Housing Rights Center was mentioned as not having addressed concerns. The President's "skeleton budget" was addressed again, and later in the meeting, homeownership was discussed. This latter topic was connected to the Housing Authority's program for helping residents to transit to owning a home. Public transportation was addressed later, and was generally viewed in positive light by the residents, from the light rail to the busses. School quality was addressed as a concern, as one resident felt that schools were falling behind and were of substandard quality. There was concern about a perceived lack of investment in working class, middle-income housing, as only extremely low-income housing or high-end housing was being built. Rent increases and rent control were again brought up toward the end of the meeting, and the concerned resident was told this issue would be brought up to the management of the development.

The meeting in West Hollywood began with a clarification on the formal hearing process. One resident of the city felt that the process of registering a complaint against fair housing discrimination was too difficult a process to make it worth the effort. Other residents were frustrated by the process of HUD regulations for resolving grievances. The topic of age limits was discussed also residents were urged to write letters regarding housing complaints. Residents were told about additional October meetings, to which all were invited. One resident addressed safety at his/her apartment building and ensuing frustrations that arise when it hasn't been fixed. There was some consternation about the availability of the survey to residents, particularly in Russian, but they were assured the survey was available on the CDC website. Residents were told about the AFH to be released to the public on August 13th.

The Palmdale RAB meeting began with a question about housing representatives being present. Residents mentioned the 'clustering' nature of having folks with vouchers living close to one another. Rental increases was another topic discussed by the residents and the need for rent control was also mentioned. A resident mentioned safety as a concern in his/her neighborhood. One resident talked about the need to make fair housing laws more clear and know to voucher recipients. Clarification was given to the residents on the difference between the Public Housing Program and the Section 8 Program. Finally, there was need for fresher, non-GMO vegetables and foods in poor areas.

Transcripts for the RAB Meetings can be found in Technical Appendix Section V.

E. COMMUNITY INPUT MEETINGS

Six community meetings were conducted on April 18, 19, 20 and April 25, 26, and 27, with at least one held in each of the five supervisorial districts and were very well-attended by members of the community. Sign-in sheets from the six meetings are included in Technical Appendix Section V, and while a total of 265 names are listed on all sign-in sheets, the total attendance for all six meetings is closer to 300, as some attendees did not sign in if they came late or did not sign in at the reception table. At these meetings, attendees were asked to fill out surveys, the responses from which are summarized below.

1ST DISTRICT COMMUNITY MEETING

The community input meeting in the first supervisorial district was held on April 18th, 2017, at 6:30 P.M. at Sunshine Park in La Puente. A total of 33 community members signed in, while a total of 34 surveys were collected (some were mailed in before the meeting).

Several residents mentioned illegal fireworks were a problem in the community and needed to be addressed, along with trash and street racing. Housing



issues that concerned community members included not wanting to see development of condos or townhomes (only single-family), a concern over residents who convert their garages into homes, and the need for affordable ("starter") homes for first-time homeowners.

2ND DISTRICT COMMUNITY MEETING

The community input meeting in the second supervisorial district was held April 27th, 2017, at 6:30 P.M. at Athens Park Gymnasium in Los Angeles. A total of 41 community members signed in and a total of 33 surveys were collected (while some were mailed in before the meeting).

Residents mentioned safety issues around the community, such as gang activity, shootings, and cars



driving too fast. One resident felt the meeting did not meet her needs, as the topics discussed were not relevant to her particular housing situation. Related to housing, residents mentioned no rent control, too little safe and affordable housing, and problems with LA County regarding inspection and building safety as issues of concern. One resident in particular highlighted the importance of providing affordable housing for disabled residents and that senior housing be equipped with in-unit washer and dryers.

3RD DISTRICT COMMUNITY MEETING

The community input meeting in the third supervisorial district was held April 20th, 2017, at 6:30 P.M. at the San Fernando Regional Pool. A total of 22 community members signed in and a total of 15 surveys were collected (some were mailed in before the meeting).

There were few responses from the survey for the 3rd District meeting, but one resident expressed concern over the possible removal of Proposition 13, an



amendment to the Constitution of California that reduced property tax rates on homes. Another resident was opposed to public housing in San Fernando but did not give a reason.

4TH DISTRICT COMMUNITY MEETING

The community input meeting in the fourth supervisorial district was held April 19th, 2017, at 6:30 P.M. at South Whittier Library in Whittier. A total of 48 community members signed in and a total of 38 surveys were collected (while some were mailed in before the meeting).

Topics discussed in the survey by attendees includes walkability issues, trash problems, access to parks and



green space, speeding and other traffic issues, inadequate law enforcement, and better access to transit. Pertaining to housing, community members mentioned high rent and, in particular, the need for affordable senior housing.

5TH DISTRICT COMMUNITY MEETING

The first community input meeting in the fifth supervisorial district was held April 25th, 2017, at 6:30 P.M. at Jackie Robinson Park in Littlerock. A total of 71 community members signed in and a total of 49 surveys were collected (while some were mailed in before the meeting).

This meeting elicited the most responses out of all the community input meetings. The issues that concerned



attendees ranged from poor street paving quality, better streetlights and sidewalks, more recreation options for seniors, better trash cleanup and stricter regulations against dumping, difficulty in accessing county services (DPSS, DMH, and HA were mentioned), and better community spaces. One resident expressed concern over a lack of monitoring the Section 8 voucher program and a desire to keep Littlerock rural.

5TH DISTRICT COMMUNITY MEETING (PAMELA PARK)

The second community input meeting in the fifth supervisorial district was held April 26th, 2017, at 6:30 P.M. at Pamela Park in Duarte. A total of 33 community members signed in and a total of 32 surveys were collected (while some were mailed in before the meeting).

Concerns from the surveys included stray dogs and pets around Duarte, safety and better street lighting,



concerns over the sewer project, and street parking regulations. The only resident to address housing concerns mentioned the desire for more affordable housing options for seniors.

F. THE 2017 RESIDENT FAIR HOUSING SURVEY

The 2017 Fair Housing Survey for the City and the County of Los Angeles was created to gain the opinions from the residents on their neighborhoods, housing, community needs, and their household. A total of 6,290 responses were collected, and the survey came about from collaboration between the Community Development Commission of the County of Los Angeles, Housing Authority of the County of Los Angeles, City of Los Angeles, and the Housing Authority of the City of Los Angeles.

Many topics were addressed in the survey, including displacement, perceived safety, rental increases, and discrimination. Most respondents had not been displaced in the last 10 years from their housing, and most respondents were also either satisfied or somewhat satisfied with the quality of their current housing. Section IV includes much more in-depth analysis of the survey results and even separates out respondents by CDC and HACoLA service area.

The survey was divided into four different sections such as Your Neighborhood, which asked questions about how long have you lived there, what is the name of your housing authority and please rate a variety of aspects about your neighborhood; Your Housing, which asked respondents about their housing costs; New Housing, which asked respondents about new housing searches, if they felt discriminated, and if they files a compliant with and agency; and About You and Your Household, which asked questions about disability, homelessness, the number of people living in their household, their age, and race and ethnicity. The survey was translated into several languages including Russian, Armenian, Tagalog, Korean, Chinese, and Spanish. It was accessed through the City and the County's websites as well as through community meetings and mailings.

G. STAKEHOLDER SURVEY

The Fair Housing Stakeholder Survey conducted from January through April 2017 was administered electronically and collected a total of 108 responses. The survey asked 37 total questions and was split into 6 sections:

- 1. Fair Housing in the County and City of Los Angeles
- 2. Federal and State Fair Housing Laws
- 3. Fair Housing Activities in the County and City of Los Angeles
- 4. Fair Housing in the Private Sector
- 5. Fair Housing in the Public Sector
- 6. Concluding Questions

Most respondents were either advocate/service providers or worked in law or legal services (for more detail, see Section IV). Most respondents indicated some familiarity with fair housing laws and around one-third were aware of questionable practices or barriers to fair housing choice in the rental housing, real estate, mortgage and home lending, housing construction, home insurance, or home appraisal industries.

H. PLANNING AND ZONING SURVEY

As part of the preparation of this AFH, the 2017 Los Angeles County Planning and Zoning Survey was administered electronically and provided by the Los Angeles Community Development Commission. The survey, which ran from January through March, sought to collect answers to 35 questions regarding local governmental codes or policies and practices that may result in the creation or perpetuation of one or more impediments to fair housing choice. A total of 49 responses were collected, and nearly all the questions were posed to elicit a "yes" or "no" response; respondents who said "yes" were asked to elaborate with a narrative response.

The survey was intended to help with the analysis of the codes and other issues related to land use and zoning decision-making provided by each of the 47 participating cities, plus Los Angeles County for the unincorporated areas of the county. When asked if their respective municipal code contained possibly discriminatory definitions of "family" or "dwelling unit," the following cities answered that there were such definitions: La Puente, Lakewood, and South Pasadena. Another possible indication of discriminatory practices, seventeen jurisdictions indicated that senior housing needed a conditional use permit. For more extensive analysis of the survey results, see Section IV.

I. FINAL PUBLIC REVIEW PRESENTATION

A formal presentation will be made in a setting designated by the Community Development Commission of the County of Los Angeles during a 45-day public review period which will run from August 13 through September 26. The presentation is not available at this time.

J. PUBLIC OUTREACH: ADDITIONAL INFORMATION

For the Resident Fair Housing Survey and community meetings, the CDC sent out 60,455 mailings, and of these, over 37,000 included a Community Meeting Flyer, Resident Fair Housing Survey, and a stamped return envelope. The other 23,000 simply included a flyer for the community meeting. These mailings targeted all public housing residents, a 25 percent sample of Section 8 residents, residents living in the Urban County, and residents living in R/ECAP areas. The surveys were translated into Russian, Armenian, Tagalog, Korean, Chinese, and Spanish, depending on the area to which they were mailed (see Section II.F for more information about the Resident Fair Housing Survey).

Additionally, the CDC published countywide public notices in five languages in the Los Angeles Times, Chinese Daily News, Korean Times, Panorama (Russian), and La Opinion. Using an electronic distribution list, the CDC requested assistance from partner Community-Based Organizations and County Departments to disseminate the flyer and survey. Residents who signed up for the CDC's outreach email list were sent the flyer and survey. Community centers, partnering cities, and other local organizations displayed the community meeting flyers. The CDC website provided access to the 2017 Resident Fair Housing Survey as well as information about community meetings. Each District Board Office was enlisted to assist in the outreach effort, and Quick Response (QR) codes were included on flyers for easy access for the more tech savvy residents.

SECTION III. ASSESSMENT OF PAST GOALS AND ACTIONS

The purpose of this section of the Assessment of Fair Housing is to succinctly review the goals and strategies of the previous Analysis of Impediments to Fair Housing Choice (AI) conducted in 2011 and determine the progress that has been made in light of these goals since that time. The 2011 AI identified 18 impediments for the private sector and 14 impediments for the public sector.

A. PAST IMPEDIMENTS AND ACTIONS

Provisions to affirmatively furthering fair housing are long-standing components of HUD's housing and community development programs. In exchange for receiving federal funds from HUD, the County certifies that it is affirmatively furthering fair housing. The requirements of such certification comprise the following elements:

- 1. Conduct an Analysis of Impediments to Fair Housing Choice;
- 2. Take actions to remedy impediments, if impediments are identified;
- 3. Maintain records of the analysis and actions taken.

The first element in the certification process noted above has resulted in several impediments to fair housing choice. HUD's definition of an impediment, reprinted here from the *Fair Housing Planning Guide*, page 2-6, that that "Impediments to fair housing choice are:

- Actions omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin which restrict housing choices or the availability of housing choices
- Any actions, omissions, or decisions which have the effect of restricting housing choices or the availability of housing choices on the basis of race, color, religion, sex, disability, familial status, or national origin."

While numerous housing issues were uncovered in the process of conducting this AI, only those issues that were shown to qualify as impediments to fair housing choice based on the definition printed immediately above, albeit with the inclusion of the classes protected under California state law: ancestry, color, marital status, sexual orientation, and source of income.

These items are listed below for both the private and public housing sectors and are accompanied by specific actions that the County will follow to attempt to remedy these issues.

Impediments to Fair Housing Choice

Private Sector

- 1. Harassment of existing and potential renters
- 2. Denial of available housing units in the rental markets
- 3. Refusal to accept rental applications or to rent

- 4. Discriminatory terms, conditions, privileges or facilities relating to rental
- 5. Failure to make reasonable accommodations or modifications
- 6. Wrongful eviction
- 7. Hesitancy to file complaints for fear of retaliation
- 8. Failure to provide leasing documents in native languages
- 9. Steering activities by rental housing agencies
- 10. Preferences stated in advertisements for rental housing
- 11. Denial of availability of housing in the home purchase markets
- 12. Steering, redlining, reverse redlining and blockbusting activities
- 13. Preferences given to persons not utilizing home buyer assistance programs
- 14. Denial of home purchase loans
- 15. Predatory lending in the home purchase market
- 16. Failure to comply with accessibility requirements in construction of housing units
- 17. Inequitable investment of Community Reinvestment Act resources
- 18. Failure by housing consumers to actively participate in fair housing outreach including education sessions or Al public input opportunities

Public Sector

- 1. Failure to establish compliant fair housing policies on the part of several participating cities
- 2. Ineffective fair housing outreach and education efforts
- 3. Failure to adequately enforce fair housing laws
- 4. Access to fair housing services has been made burdensome
- 5. Failure to make reasonable accommodation in the public housing market, including allowance of service animals
- 6. Extortion and bribery activities in response to requests to be placed on housing assistance lists
- 7. Land use and planning decisions and operational practices result in unequal access to government services, such as transportation
- 8. Historical establishment of policies and practices resulting in segregation of minority populations
- 9. Insufficient establishment of building codes regarding special needs housing
- 10. Lack of enforcement of codes, including health and safety codes and ADA codes
- 11. Decisions regarding definitions of "family," "dwelling units" and related terms
- 12. Implementation of exclusionary policies
- 13. Failure to engage in actions to affirmatively further fair housing and the Al process by government agencies
- 14. Insufficient inclusion of persons adversely affected by housing discrimination as protected classes under federal or state law including domestic violence victims⁸ and the elderly

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⁸ See HUD guidance on this matter in Section H of the Technical Appendix

Actions Taken to Overcome Impediments

The Southern California Housing Rights Center (HRC) receives a multi-year grant from HUD to conduct systemic testing in areas within Los Angeles County where statistics point to any form of discrimination covered by applicable fair housing laws and, in particular, persistent housing discrimination based on race, national origin, familial status and disability. As of 2014 (the most recent year available on HUD's website), the HRC has been awarded a grant in the amount of \$325,000 to perform these actions.

In addition to the HUD grant, the HRC has a contract with the County's Community Development Commission for a variety of services addressing private sector impediments, such as providing education and training to housing providers on fair housing, distributing 16,000 pieces of fair housing literature annually, and hosting no less than 3 special events per year to inform the public about fair housing matters.

According to the HRC's 4th Quarter Performance Report for Fiscal Year 2014 – 2015, there were a total of 3,490 clients to whom were given direct service and a total of 160,160 total points of contact within outreach and education.¹⁰ According to the HRC's report for the 2015 – 2016 Fiscal Year, the number of clients who were provided direct service fell slightly to 3,239, while the points of contact for outreach and education climbed to 191,229.¹¹

The Community Development Commission is continuing the process of addressing impediments to fair housing in the public sector. These impediments are outlined below.

Impediments Matrix

A matrix was used to more closely detail the source or sources from which the impediments were derived. Table III.1 and Table III.2, on the following pages, list the impediments, by private and public sector, and demonstrate which sources supported the issue as an impediment to fair housing choice within the Urban County. The protected classes most often noted to be cited in relation to the impediment has been included as well.

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⁹ https://portal.hud.gov/hudportal/documents/huddoc?id = FHIP2014GrantSum.pdf.

¹⁰ This number includes media contacts, community meetings attended, pieces of literature distributed, special events, and clinics held.

¹¹ For more information provided by the HPC regarding its program summary for the past two fiscal years, see discussion below as well.

¹¹ For more information provided by the HRC regarding its program summary for the past two fiscal years, see discussion below as well as Technical Appendix Section VII.

Table III.1
Private Sector Impediments Matrix

Impediment	Source							Protected Classes Affected					
Private Sector	Census Data	CRA Data	Literature/Case Review	HMDA Data	Complaint Review	Compliance Review	Fair Housing Survey	Planning and Zoning Survey	Focus Groups	Fair Housing Forums	HRC Input	Other	
Harassment of existing and potential renters			Х				Х		Х	Х			National origin, race, disability, familial status, sexual orientation
Denial of available housing units in the rental markets			Х				Х						Race, national origin, disability, familial status, sexual orientation, sex
Refusal to accept rental applications or to rent			Х				Х		Х	Х			Race, national origin, disability, familial status
Discriminatory terms, conditions, privileges or facilities relating to rental					Х								Familial status, race, national origin, disability
Failure to make reasonable accommodations or modifications					Х					Х			Disability
Wrongful eviction			Х				Х		Х	Х			Disability, familial status
Hesitancy to file complaints for fear of retaliation			Х						Х				Race, national origin, familial status
Failure to provide leasing documents in native languages							Х		Х				National origin
Steering activities by rental housing agencies							Х						Race, national origin, sexual orientation
Preferences stated in advertisement for rental housing					Х							Х	Sex, religion, familial status
Denial of availability of housing in the home purchase markets							Х						Sexual orientation, national origin, race
Steering, redlining, reverse redlining and blockbusting activities			Х				Х		Х				National origin, race, sexual orientation
Preferences given to persons not utilizing home buyer assistance programs							Х		Х				Source of Income
Denial of home purchase loans				Х									Race, national origin, sex
Predatory lending in the home purchase market			Х	Х			Х		Х				Race, national origin
Failure to comply with accessibility requirements in construction of housing units							Х						Disability
Inequitable investment of Community Reinvestment Act resources		Х											All
Failure by housing consumers to actively participate in fair housing outreach including education sessions or Al public input opportunities							х			х		х	All

Table III.2
Public Sector Impediments Matrix

Impediment	Source								Protected Classes Affected				
Public Sector	Census Data	CRA Data	Literature Review	HMDA Data	Complaint Review	Compliance Review	Fair Housing Survey	Planning and Zoning Survey	Focus Groups	Fair Housing Forums	HRC Input	Other	
Failure to establish compliant fair housing policies on the part of several participating cities						Х							All
Ineffective fair housing outreach and education efforts							Х		Х	Х			All
Failure to adequately enforce fair housing laws							X		X	X			All
Access to fair housing services has been made burdensome					Х		,,					Х	All
Failure to make reasonable accommodations in the public housing market, including allowance of service animals			Х				Х			Х	Х		Disability
Extortion and bribery activities in response to requests to be placed on housing assistance lists										Х			National origin, familial status, sex
Land use and planning decisions and operational practices result in unequal access to government services, such as transportation	Х						Х				Х	Х	Familial status, disability, race, national origin
Historical establishment of policies resulting in segregation of minority populations	Х		Х										Race, national origin, disability
Insufficient establishment of building codes regarding special needs housing							Х		Х				Disability
Lack of enforcement of codes, including health and safety codes and ADA codes							Х		Х		Х		Race, national origin, familial status, disability
Decisions regarding definitions of "family," "dwelling units" and related terms							Х	Х					Familial status, disability
Implementation of exclusionary policies			Х					Х					Familial status, disability
Failure to engage in actions to affirmatively further fair housing and the Al process by government agencies						Х		Х					All
Insufficient inclusion of persons adversely affected by housing discrimination as protected classes including domestic violence victims and the elderly							Х		Х	х			-

Suggested Actions to Resolve Impediments

Private Sector

1. **Impediment**: Harassment of existing and potential renters

Actions: Conduct testing and enforcement activities; educate landlords and property management companies in fair housing law; educate housing consumers in fair housing rights

2. **Impediment**: Denial of available housing units in the rental markets

Actions: Conduct testing and enforcement activities; educate landlords and property management companies in fair housing law; educate housing consumers in fair housing rights

3. **Impediment**: Refusal to accept rental applications or to rent

Actions: Conduct testing and enforcement activities; educate landlords and property management companies in fair housing law; educate housing consumers in fair housing rights

4. **Impediment**: Discriminatory terms, conditions, privileges or facilities relating to rental

Actions: Conduct testing and enforcement activities; educate landlords and property management companies in fair housing law; educate housing consumers in fair housing rights

5. **Impediment**: Failure to make reasonable accommodations or modifications

Actions: Conduct testing and enforcement activities; hold training sessions to educate housing providers in requirements regarding reasonable accommodation or modification

6. **Impediment**: Wrongful eviction

Actions: Conduct testing and enforcement activities; educate landlords and property management companies in fair housing law; educate housing consumers in fair housing rights

7. **Impediment**: Hesitancy to file complaints for fear of retaliation

Actions: Conduct testing and enforcement activities; work to expand awareness of fair housing services

8. **Impediment**: Failure to provide leasing documents in native languages

Actions: Conduct testing and enforcement activities; educate landlords and property management companies in fair housing law; educate housing consumers in fair housing rights in multiple language formats

- 9. **Impediment**: Steering activities by rental housing agencies **Actions**: Conduct testing and enforcement activities; educate landlords and property management companies in fair housing law; educate housing consumers in fair housing rights
- 10. **Impediment**: Preferences stated in advertisements for rental housing **Actions**: Educate landlords and property management companies in fair housing law; conduct testing activities to determine extent of problem
- 11. **Impediment**: Denial of availability of housing in the home purchase markets **Actions**: Conduct testing and enforcement activities; educate real estate agents and brokers in fair housing law; educate housing consumers in fair housing rights
- 12. **Impediment**: Steering, redlining, reverse redlining and blockbusting activities **Actions**: Conduct testing activities to determine the scope of the problem
- 13. **Impediment**: Preferences given to persons not utilizing home buyer assistance programs

Actions: Educate real estate agents, lending officers and sellers about home purchase assistance programs

- 14. **Impediment**: Denial of home purchase loans **Actions**: Conduct testing activities to determine the scope of the problem; educate buyers through home purchase courses
- 15. **Impediment**: Predatory lending in the home purchase market **Actions**: Conduct testing activities to determine the scope of the problem; educate buyers through home purchase courses
- 16. **Impediment**: Failure to comply with accessibility requirements in construction of housing units

Actions: Increase monitoring of home construction projects; offer code requirements in multiple language formats

- 17. **Impediment**: Inequitable investment of Community Reinvestment Act resources **Actions**: Monitor Community Reinvestment Act lending practices; advise Bankers' Association of findings
- 18. **Impediment**: Failure by housing consumers to actively participate in fair housing outreach including education sessions or Al public input opportunities **Actions**: Enhance current outreach and education efforts to make fair housing more approachable and accessible for housing consumers

Public Sector

1. **Impediment**: Failure to establish compliant fair housing policies by several participating cities

Actions: Encourage communities that are out of compliance to adopt appropriate fair housing policies and practices; monitor compliance

2. **Impediment**: Ineffective fair housing outreach and education efforts **Actions**: Evaluate current fair housing outreach and education efforts; examine ways in which these activities could be made more effective; implement enhancements

Impediment: Failure to adequately enforce fair housing laws
 Actions: Increase the level of monitoring and enforcement of laws related to fair housing

4. **Impediment**: Access to fair housing services has been made burdensome **Actions**: Work to streamline accessibility to fair housing services; simplify complaint avenues; open additional fair housing offices

5. **Impediment**: Failure to make reasonable accommodation in the public housing market, including allowance of service animals

Actions: Conduct testing and enforcement activities in public housing agencies to determine scope of problem, especially in light of recent revisions to definitions of "reasonable accommodations" from HUD in relation to service animals;¹² advise violators of problems and request change; monitor change

6. **Impediment**: Extortion and bribery activities in response to requests to be placed on housing assistance lists

Actions: Conduct testing activities to determine scope of problem; conduct enforcement activities including litigation

7. **Impediment**: Land use and planning decisions and operational practices resulting in unequal access to government services such as transportation

Actions: Evaluate planning decisions in relation to placement of government services; make changes to improve equity

8. **Impediment**: Historical establishment of policies and practices resulting in segregation of minority populations

Actions: Review land use and planning policies and practices in participating jurisdictions; review housing element compliance and encourage appropriate revisions; monitor changes; provide greater incentive for landlords with properties throughout the Urban County to accept Section 8 vouchers; further study low income housing tax credits as part of mixed income integration strategy

¹² See HUD letter in Technical Appendix, Section H

9. **Impediment**: Insufficient establishment of building codes regarding special needs housing

Actions: Encourage local communities to evaluate building codes and revise as needed; monitor progress

10. **Impediment**: Lack of enforcement of codes, including health and safety codes and ADA codes

Actions: Enhance monitoring and enforcement of codes in relation to accessibility requirements

11. **Impediment**: Decisions regarding definitions of "family," "dwelling units" and related terms

Actions: Encourage local communities to reevaluate definitions that may restrict access to housing; monitor communities that may not be in compliance

12. **Impediment**: Implementation of exclusionary policies

Actions: Encourage local communities to review policies that may restrict access to housing; monitor changes made by local communities

13. **Impediment**: Failure to engage in actions to affirmatively further fair housing and the AI process by government agencies

Actions: Encourage local communities to participate in affirmatively furthering fair housing; monitor levels of commitment made to fair housing by government agencies

14. **Impediment**: Insufficient inclusion of persons adversely affected by housing discrimination as protected classes under federal or state law including domestic violence victims¹³ and the elderly

Actions: Encourage legislative change for inclusion of affected classes

Los Angeles County's 2015-2016 Consolidated Annual Performance and Evaluation Report (CAPER) outlines major initiatives and highlights that were proposed and executed throughout the program year. ¹⁴ The table below is adapted from that document and highlights pertinent goals and outcomes.

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¹³ See HUD guidance on this matter in Section H of the Technical Appendix

 $^{^{14} \} https://www.lacdc.org/docs/default-source/community-development-block-grant/caper/2015-2016-caper/cr-05-goals-and-outcomes.pdf?sfvrsn = 2$

B. PAST AND CURRENT GOALS

The CDC contracts with the Housing Rights Center (HRC) and its subcontractors, the Fair Housing Foundation and the Fair Housing Council of the San Fernando Valley, to provide fair housing services to County residents and meet the goals set forth in the County's fair housing strategic plan. HRC services West and Eastern Los Angeles County; the Fair Housing Foundation primarily focuses on Southern County areas; and the Fair Housing Council of San Fernando Valley provides service to the Northern County. Combined, they provide a broad and significant level of outreach and education, conducting advertising campaigns, offering management training, and having housing walk-in clinics, community events, and general presentations to various units of government. These agencies also offer counseling efforts and the pursuit of fair housing testing and enforcement activities.

HRC and its subcontractors met and exceeded various categories of fair housing services assistance in relation to the County's goals and strategies for FY 2015 – 2016 and FY 2014 – 2015. As compared to the annual goal of 3,700 general and fair housing services, the County fair housing contractors provided service to 3,239 direct clients, or 88 percent of their annual goal in FY15-16 and 3,490 clients, or 94 percent of the goal in FY14-15. Their services also provided 191,229 client contacts through their outreach and education efforts last year, while their services provided assistance through 49,486 client contacts in FY14-15.

A total of 269 fair housing inquiries were received in FY15-16, with 159 clients counseled, 77 cases opened, 25 cases referred to other agencies, and 8 cases pending. In FY14-15, a total of 232 inquiries were received and dispositions taken, with 125 clients counseled, 85 cases opened, 14 cases referred, and 8 cases pending.

Outreach and education activities included a variety of fair housing activities, such as: public awareness campaigns in advertisements and public service announcements; community events and educational forums, such as community presentations; walk-in clinics; and tester trainings. Over 19,472 pieces of fair housing literature were distributed in FY15-16 by fair housing staff throughout the County, while in FY14-15, 16,024 pieces were distributed. Fair housing service providers organized 20 informational booths and attended 14 community meetings and events during the program year for FY15-16, while the previous year, fair housing service providers organized 24 informational booths and attended 19 community meetings.

Fair housing services information was also distributed through 67 advertisements, public service announcements, and other media formats in FY15-16, while the previous year, information was distributed through 68. Fair housing staff provided presentations/workshops, conducted 13 management trainings, and attended 3 special events in FY15-16, while the previous year, staff provided 33 presentations/workshops, conducted 7 management trainings, and attended 4 special events. In FY15-16, 3 tester trainings and 1 walkin clinic were implemented, while 2 tester trainings and 11 walk-in clinics were implemented in FY14-15.

In FY13-14, HRC and its subcontractors met and exceeded the various categories of fair housing services assistance in relation to the County's goals and strategies. As compared to the annual goal of 3,700 general housing services, the County fair housing contractors provided 3,311 services, or 89% of their annual goal. However, their services directly provided fair housing assistance through 42,195 client contacts. The majority of direct beneficiaries served were in the Extremely Low-Income and Low-Income categories, with 726 and 116 clients in each category respectively. Following these two categories, 82 moderate-Income clients received services. A total of 241 fair housing inquiries were received and dispositions taken; with 133 clients counseled, 78 cases opened, 26 cases referred to other agencies, and 4 cases pending.

Outreach and education activities included a variety of fair housing activities, such as: public awareness campaigns in advertisements; public service announcements; community events and educational forums, such as community presentations; walk-in clinics; and tester trainings. Over 19,700 pieces of fair housing literature were distributed by fair housing staff throughout the County. Fair housing service providers organized 23 informational booths and attended 23 community meetings and events during the program year. Fair housing services information was also distributed through 69 advertisements, public service announcements, and other media formats during the program year. Fair housing staff was also available to provide 27 presentations/workshops, conduct 6 management trainings, made 1 presentation to government staff and attended 5 special events. Three tester trainings and 9 walk-in clinics were implemented, as well.

SECTION IV. FAIR HOUSING ANALYSIS

OVERVIEW

This section presents demographic, economic, and housing information, as drawn from decennial Census, the American Community Survey, and HUD's AFFH databases. These data were used to analyze a broad range of socio-economic characteristics, including population growth, race, ethnicity, disability, employment, poverty, and housing trends; these data are also available by Census tract, and are shown in a variety of geographic maps. Furthermore, additional local data was utilized, when available. Such information included data from the Los Angeles County Sherriff, the Home Mortgage Disclosure Act, the Los Angeles County Department of Public Health, the Community Reinvestment Act, and the 2017 Resident Fair Housing Survey, among others. Ultimately, the information presented in this section illustrates the underlying conditions that shape housing market behavior and housing choice in Los Angeles County.

The Community Development Commission has an Urban County designation for its CDBG program. This designation represents some 47 cities in the County, as noted below in Table IV.1, as well as all remaining unincorporated areas of the County.

Table IV.1Participating Cities in the Los Angeles Urban County

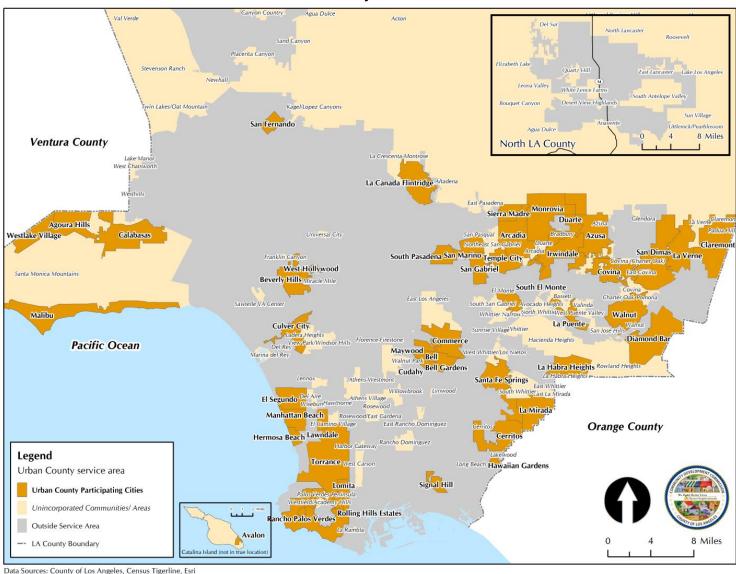
Agoura Hills	Commerce	La Cañada Flintridge	Monrovia	South El Monte
Arcadia	Covina	La Habra Heights	Rancho Palos Verdes	South Pasadena
Avalon	Cudahy	La Mirada	Rolling Hills Estates	Temple City
Azusa	Culver City	La Puente	San Dimas	Torrance
Bell	Diamond Bar	La Verne	San Fernando	Walnut
Bell Gardens	Duarte	Lawndale	San Gabriel	West Hollywood
Beverly Hills	El Segundo	Lomita	San Marino	Westlake Village
Calabasas	Hawaiian Gardens	Malibu	Santa Fe Springs	
Cerritos	Hermosa Beach	Manhattan Beach	Sierra Madre	
Claremont	Irwindale	Maywood	Signal Hill	

The Urban County also has a number of Census Designated Places (CDP), or unincorporated communities in the County, as noted below in Table IV.2, along with other Non-CDP areas that are unincorporated.

Table IV.2
Unincorporated Communities in the Los Angeles Urban County

Unincorporated Communities in the Los Angeles Urban County											
Acton	Del Aire	La Habra Heights	North Whittier	South Edwards							
Agoura	Del Rey	La Rambla	Northeast San Gabriel	South El Monte							
Agua Dulce	Del Sure	La Verne	Padua Hills	South San Gabriel							
Altadena	Desert View Highlands	Ladera Heights	Palmdale	South Whittier							
Anaverde	Duarte	Lake Hughes	Palos Verdes Peninsula	Stevenson Ranch (Santa Clarita)							
Angeles National Forest	East Covina	Lake Los Angeles	Pearblossom/Llano	Sulpher Springs							
Antelope Acres	East La Mirada	Lake Manor	Pellissier Village	Sun Village							
Arcadia	East Lancaster	Lakewood	Pinetree	Sunrise Village							
Athens Village	East Los Angeles	Lang	Placerita Canyon	Topanga							
Athens-Westmont	East Pasadena	Lawndale	Pomona	Torrance							
Avocado Heights	East Rancho Dominguez	Lennox	Quartz Hill	Twin Lakes/Oat Mountain							
Azusa	East Whittier	Leona Valley	Rancho Dominguez	Universal City							
Baldwin Hills	El Camino Village	Littlerock	Rolling Hills	Val Verde							
Bandini Islands	El Monte	Littlerock/Juniper Hills	Roosevelt	Valencia (Santa Clarita)							
Bassett	El Nido	Littlerock/Pearblossom	Rosewood	Valinda							
Bouquet Canyon	El Porto	Llano	Rosewood/East Gardena	Valyermo							
Bradbury	Elizabeth Lake	Long Beach	Rosewood/West Rancho Dominguez	Vasquez Rocks							
Calabasas Highlands	Fernwood	Los Angeles	Rowland Heights	View Park/Windsor Hills							
Calabasas Park	Florence-Firestone	Lynwood	San Clemente Island	Walnut							
Canyon Country (Santa Clarita)	Forest Park	Malibu Bowl (Malibu)	San Francisquito Canyon/Bouquet Canyon	Walnut Park							
Carson	Franklin Canyon	Malibu Lake	San Jose Hills	West Antelope Valley							
Castaic	Glendora	Marina del Rey	San Pasqual	West Carson							
Cerritos	Glenview	Mint Canyon	Sand Canyon	West Chatsworth							
Charter Oak	Green Valley	Miracle Mile	Santa Catalina Island	West Puente Valley							
City Terrace	Hacienda Heights	Miraleste	Santa Monica Mountains	West Rancho Dominguez							
Claremont	Harbor Gateway	Monrovia	Saugus (Santa Clarita)	Willowbrook							
Compton	Hawthorne	Monte Nido	Saugus/Canyon Country	Wilsona Gardens							
Cornell	Hi Vista	Montrose	Sawtelle VA Center	Wiseburn							
Covina	Kagel/Lopez Canyons	Newhall (Santa Clarita)	Soledad								
Covina (Charter Oak)	La Crescenta- Montrose	North Lancaster	South Antelope Valley								

Map IV.1, presented on the following page, shows the participating cities, unincorporated Census Designated Places, and other unincorporated areas in the Urban County service area.



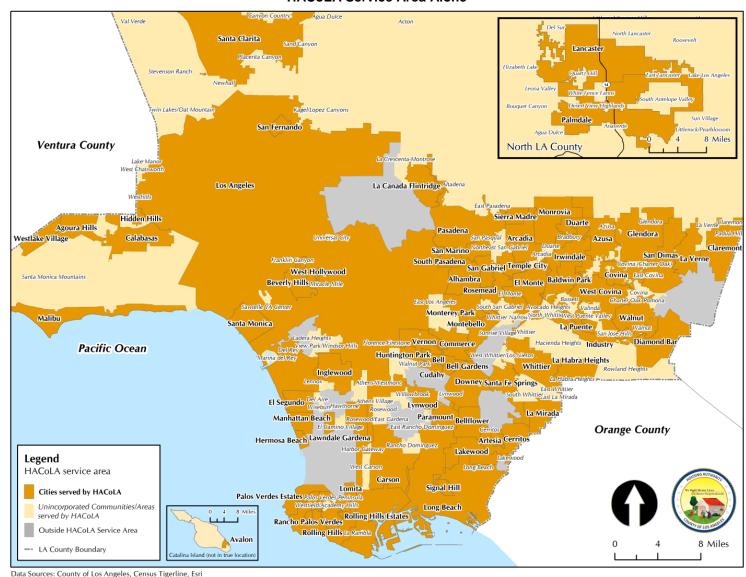
Map IV.1
Urban County Service Area

On the other hand, the Housing Authority of the County of Los Angeles (HACoLA) has a significantly different set of cities comprising the Housing Authority service area noted in Table IV.3 below. It also retains many of the unincorporated communities seen above in Table IV.2.

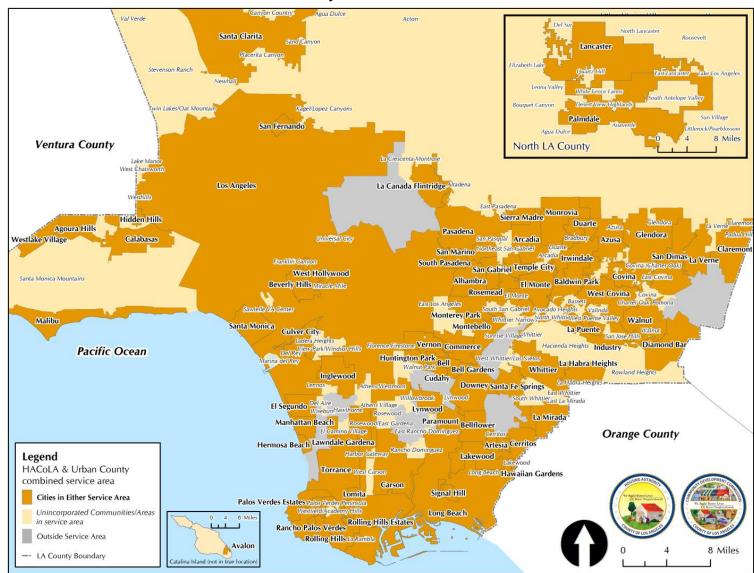
Table IV.3
Cities Served by the Housing Authority of the County of Los Angeles

Onics served by the Housing Authority of the Sounty of Los Angeles									
Agoura Hills	Commerce	La Canada Flintridge	Montebello	Santa Monica					
Alhambra	Covina	La Habra Heights	Monterey Park	Sierra Madre					
Arcadia	Cudahy	La Mirada	Palmdale	Signal Hill					
Artesia	Diamond Bar	La Puente	Palos Verdes Estates	South El Monte					
Avalon (Catalina Island)	Downey	La Verne	Paramount	South Pasadena					
Azusa	Duarte	Lakewood	Pasadena	Temple City					
Baldwin Park	El Monte	Lancaster	Rancho Palos Verdes	Vernon					
Bell	El Segundo	Lawndale	Rolling Hills	Walnut					
Bell Gardens	Gardena	Lomita	Rolling Hills Estates	West Covina					
Bellflower	Glendora	Long Beach	Rosemead	West Hollywood					
Beverly Hills	Hermosa Beach	Los Angeles	San Dimas	Westlake Village					
Bradbury	Hidden Hills	Lynwood	San Fernando	Whittier					
Calabasas	Huntington Park	Malibu	San Gabriel						
Carson	Industry	Manhattan Beach	San Marino						
Cerritos	Inglewood	Maywood	Santa Clarita						
Claremont	Irwindale	Monrovia	Santa Fe Springs						

Map IV.2, presented below, shows the service area for cities and unincorporated communities served by Housing Authority's 68 properties, public housing program locations, and locations of the Section 8 Vouchers. Map IV.3, presented on page 69, shows the combined service area for the Urban County and HACoLA, with cities in dark orange and unincorporated areas in light tan.



Map IV.2
HACoLA Service Area Alone



Map IV.3
Urban County and HACoLA Service Areas

For the CDC and HACoLA

AGENCY DESCRIPTIONS

COMMUNITY DEVELOPMENT COMMISSION

In 1982, the Los Angeles County Board of Supervisors consolidated three entities – the Housing Authority, the Community Development Department, and the Redevelopment Agency – to form the Community Development Commission (CDC). Today, the CDC is comprised of two separate legal entities, the Housing Authority of the County of Los Angeles (Housing Authority) and the CDC, both of which are part of the County family, but are independent agencies and not County Departments.

The Board of Supervisors currently serves as the Commissioners of the CDC – which includes serving as the Commissioners of the Housing Authority of the County of Los Angeles (Housing Authority) – setting policy for the agency. The Board of Commissioners receives input from the agency's Housing Commission, which meets monthly at various locations throughout the County. Comprised of Board appointees and Housing Authority tenants, it is the Housing Commission's responsibility to review and make recommendations on matters that will be presented to the Board of Commissioners for approval, including Section 8 and public housing policies and procedures.

Although the State of California dissolved all redevelopment agencies in February 2012, the CDC continues to serve in the County of Los Angeles as an affordable housing, and community and economic development agency. The CDC's wide-ranging programs benefit residents and business owners in the unincorporated Los Angeles County areas and in various incorporated cities that participate in different CDC programs (these cities are called "participating cities"). Approximately one million of the County's more than ten million residents live in unincorporated areas.

Over 70% of the CDC's funding comes from the U.S. Department of Housing and Urban Development (HUD). The agency's four main activity areas are subsidized housing, housing development and preservation, community development, and economic development. In Fiscal Year 2016-2017, the agency has a budget of \$466 million and a total staff size of 581.

URBAN COUNTY PROGRAM DESCRIPTION

The CDC is the lead agency for the Consolidated Plan. It administers the County's CDBG, and HOME programs and the Los Angeles Homeless Services Authority administers the ESG program for the CDC. The CDC comprises numerous divisions, each with its own area of responsibility. Those divisions most directly involved with implementation of the Urban County's housing and community development strategy include Community Development, Economic and Housing Development, Assisted Housing, and Housing Management.

As the largest city in the Los Angeles eligible metropolitan statistical area (EMSA), the City of Los Angeles manages the Housing Opportunities for Persons with AIDS (HOPWA) Program. The CDC aids with managing the program by taking part in the Los Angeles Countywide

HOPWA Advisory Committee. This committee advises the City on identification of the needs and priorities of people with HIV/AIDS.

PUBLIC HOUSING PROGRAM

The Housing Authority of the County of Los Angeles (Housing Authority) serves in Los Angeles County, administering both the Section 8 Housing Choice Voucher and Public Housing programs. The Section 8 Housing Choice Voucher program currently assists approximately 23,000 families through a partnership with over 13,000 property owners. The Public Housing program manages 3,229 units of public and other affordable housing throughout Los Angeles County.

PUBLIC HOUSING PROGRAM

Public Housing refers to specific developments owned or operated by the Housing Authority which leases units directly to families.

SECTION 8 PROGRAM

The Section 8 program offers tenant-based assistance. Participants find their own housing to rent and pay a portion of their income towards rent.

A. DEMOGRAPHIC SUMMARY

PATTERNS AND TRENDS

Service Area

In the Los Angeles County Service Area,¹⁵ Hispanics represent the largest single racial or ethnic category, with over 4.3 million residents, or almost 48 percent of the overall population.¹⁶ Hispanics have grown steadily in overall numbers and in share of the population total since 2000, as seen below in Table IV.4. Besides the racial group designated "Other", the Asian population group comprises the second-largest ethnic minority in the service area, with over 1.3 million residents and almost 15 percent of the population. The White population has grown steadily since 2000 in number and in percent of the total, with nearly 5 million residents as of the 2015 Five-Year ACS. Conversely, the Black population has seen decline since 2000, down nearly 10 percent since its population of almost 840,000.

Table IV.4
Population Trends by Race and Ethnicity

Los Angeles County Service Area 2000, 2010 Census & 2015 Five-Year ACS

Race	2000 C	ensus	2010 Census		2015 Five-Year ACS	
	Population	% of Total	Population	% of Total	Population	% of Total
White	4,170,497	48.7%	4,414,072	49.8%	4,768,644	52.6%
Black	838,821	9.8%	777,767	8.8%	755,811	8.3%
American Indian	69,386	.8%	65,575	.7%	54,221	.6%
Asian	1,060,071	12.4%	1,261,752	14.2%	1,327,350	14.6%
Native Hawaiian/ Pacific Islander	23,911	.3%	23,138	.3%	25,143	.3%
Other	1,994,676	23.3%	1,924,903	21.7%	1,783,552	19.7%
Two or More Races	413,247	4.8%	396,898	4.5%	352,143	3.9%
Total	8,570,609	100.0%	8,864,105	100.0%	9,066,864	100.0%
Non-Hispanic	4,796,699	56.0%	4,678,341	52.8%	4,739,413	52.3%
Hispanic	3,773,910	44.0%	4,185,764	47.2%	4,327,451	47.7%

Foreign-born residents in the service area were most likely to be from Mexico, the home country most heavily represented among all nations of origin. Mexican-born residents numbered over 1.2 million and just over 13 percent of the total service area population, with the next most-common country being El Salvador, with 245,000 current residents originating from there. The Philippines, China, and Guatemala were the next most-prevalent nations of origin for residents, with approximately 218,000, 165,000, and 164,000 residents being born in these nations, respectively. See Table IV.5 below for a list of the ten most-common nations of origin for residents in the service area.

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¹⁵ The service area comprises the Los Angeles Urban County plus the cities served by the Housing Authority of the County of Los Angeles. Included in this latter list are the cities of Alhambra, Artesia, Baldwin Park, Bellflower, Bradbury, Carson, Downey, El Monte, Gardena, Glendora City, Hidden Hills, Huntington Park, Industry, Inglewood, Lakewood, Lancaster, Long Beach, Los Angeles, Lynwood, Montebello, Monterey Park, Palmdale, Palos Verdes Estates, Paramount City, Pasadena, Rolling Hills, Rosemead, Santa Clarita, Santa Monica, Vernon, West Covina, and Whittier.

¹⁶ Except where otherwise noted, reference to racial groups included in this study will include only non-Hispanic residents. Those who fill out the Census questionnaire may identify themselves both as a member of a particular racial group and, in a separate question, as Hispanic or non-Hispanic. Where the narrative refers to "Hispanic" residents, those references will include Hispanic residents of any and all racial groups.

Table IV.5 AFFH Table 1 – Select Demographics

Los Angeles County Service Area

National Origin	Country		Percent of Total
#1 country of origin	Mexico	1,203,151	13.3
#2 country of origin	El Salvador	245,298	2.7
#3 country of origin	Philippines	217,866	2.4
" o ocanni y or origin	China excluding Hong	2,000	
#4 country of origin	Kong and Taiwan	165,295	1.8
#5 country of origin	Guatemala	164,553	1.8
#6 country of origin	Korea	145,820	1.6
#7 country of origin	Vietnam	92,842	1.0
#8 country of origin	Iran	71,972	.8
#9 country of origin	Taiwan	63,346	.7
#10 country of origin	India	48,569	.5
Limited English Proficiency		10,000	
(LEP) Language	Language		
#1 LEP Language	Spanish	1,460,039	17.2
#2 LEP Language	Chinese	213,759	2.5
#3 LEP Language	Korean	102,070	1.2
#4 LEP Language	Tagalog	66,020	.8
#5 LEP Language	Vietnamese	45,505	.5
#6 LEP Language	Armenian	37,491	.4
#7 LEP Language	Persian	28,874	.3
#8 LEP Language	Japanese	24,563	.3
#9 LEP Language	Russian	23,513	.3
#10 LEP Language	Cambodian	16,232	.2
Disability Type			
Hearing difficulty		219,880	2.4
Vision difficulty		169,728	1.9
Cognitive difficulty		333,438	4.0
Ambulatory difficulty		481,829	5.7
Self-care difficulty		232,370	2.8
Independent living difficulty		366,924	5.3
Sex			
Male		4,373,474	49.3
Female		4,490,631	50.7
Age			
Under 18		2,158,816	24.4
18-64		5,739,756	64.8
65+		965,533	10.9
Family Type			
Families with children		948,063	32.2

Of residents with Limited English Proficiency (LEP), by far the most common language spoken is Spanish, with over 1.4 million native speakers in the service area, representing over 17 percent of the combined total population and over three times as many speakers as the next nine most-commonly spoken languages in the service area. The second most commonly spoken language by LEP residents is Chinese, with roughly 214,000 speakers, or 2.5 percent of the combined total population. See above table for the top ten non-English languages spoken in the service area.

LEP residents have remained fairly stable in numbers and in terms of share of the total population since 1990, when LEP residents totaled over 1.8 million and 23 percent of the population. In 2010, LEP residents totaled 2.1 million and comprised nearly one quarter of the combined total service area population. The peak in number and share of population for LEP residents came in 2000, when there were nearly 2.3 million residents comprising over 27 percent of the combined total (see Table IV.6 below). The total foreign-born population as a percentage of total population has flat lined somewhat since 1990, but the total number has

grown from 2.6 million in 1990 to just over 3.1 million residents currently having been born in another country, as seen below in Table IV.6.

Table IV.6
AFFH Table 2 –Demographic Trends Since 1990

Los Angeles County Service Area 1990, 2000, 2010 Census

Bass/Ethnisity	199	0	2000		201	0
Race/Ethnicity	#	%	#	%	#	%
White, Non-Hispanic	3,289,660	41.1	2,682,126	31.29	2,458,979	27.7
Black, Non-Hispanic	851,681	10.7	812,017	9.5	739,782	8.3
Hispanic	2,950,483	36.9	3,773,910	44.0	4,185,764	47.2
Asian or Pacific Islander, Non-Hispanic	858,036	10.7	1,068,839	12.5	1,262,286	14.2
Native American, Non-Hispanic	27,209	.3	23,130	.3	17,163	.2
National Origin						
Foreign-born	2,608,886	32.6	3,082,749	36.0	3,119,408 ¹⁷	34.40
LEP						
Limited English Proficiency	1,839,825	23.1	2,272,252	26.6	2,123,624 ¹⁸	25.3
Sex						
Male	3,990,681	49.9	4,238,583	49.5	4,373,474	49.3
Female	4,005,369	50.1	4,332,026	50.5	4,490,631	50.7
Age						
Under 18	2,085,725	26.1	2,388,658	27.9	2,158,816	24.4
18-64	5,135,620	64.2	5,343,288	62.3	5,739,756	64.8
65+	774,705	9.7	838,663	9.8	965,533	10.9
Family Type						
Families with children	931,622	34.4	1,160,176	40.9	948,063	32.2

Of all disability types listed, the one most commonly identified within the service area was ambulatory difficulty, at nearly 482,000 residents or 5.7 percent of the total population (see Table IV.5 on page 73). The next most common disability among residents was independent living difficulty, which was identified with nearly 367,000 residents, or 5.3 percent of the population. The least common disability, vision difficulty, was identified with only 1.9 percent of the service area population.

In 2010, there were a total of nearly 950,000 families with children, or just over 32 percent of all families in the service area. This number has declined over 18 percent since 2000.

Region

According to the recent ACS Five-Year 2015 estimate, roughly 13.1 million people lived within the Los Angeles-Long Beach-Anaheim Region (Region) of Los Angeles and Orange Counties, as shown below in Table IV.7. In 2010, the population in the Region was 12.8 million, showing an overall growth rate over that time of 2.5 percent.

¹⁷ Data for 2010 National Origin only is drawn from the 2015 Five-Year ACS.

¹⁸ Data for 2010 LEP only is drawn from the 2015 Five-Year ACS.

Table IV.7 Population Trends by Race and Ethnicity

Los Angeles-Long Beach-Anaheim Region 2000, 2010 Census & 2015 Five-Year ACS

Bees	2000 C	ensus	2010 Census		2015 Five-Year ACS	
Race	Population	% of Total	Population	% of Total	Population	% of Total
White	6,481,714	52.4%	6,767,357	52.8%	7,316,316	55.6%
Black	978,606	7.9%	907,618	7.1%	882,607	6.7%
American Indian	96,894	.8%	90,960	.7%	71,816	.5%
Asian	1,524,285	12.3%	1,884,669	14.7%	2,008,704	15.3%
Native Hawaiian/ Pacific Islander	35,991	.3%	35,448	.3%	36,605	.3%
Other	2,661,205	21.5%	2,576,273	20.1%	2,334,893	17.7%
Two or More Races	586,932	4.7%	566,512	4.4%	503,516	3.8%
Total	12,365,627	100.0%	12,828,837	100.0%	13,154,457	100.0%
Non-Hispanic	7,247,835	58.6%	7,127,975	55.6%	7,247,639	55.1%
Hispanic	5,117,792	41.4%	5,700,862	44.4%	5,906,818	44.9%

The current Regional Hispanic population of 5.9 million is nearly 45 percent of the total Regional population. This is the largest share of total population by any racial or ethnic group in the Region. This group has seen tremendous growth since 1990, when it grew from 3.8 million (34 percent of the Regional population) to 5.7 million (44 percent of the Regional population). For more comparisons of race and ethnic groups between 1990 and 2010, see Table IV.8 below.

The current Regional population of the Asian (non-Hispanic) racial group is 2 million, or over 15 percent of the total Regional population. This racial group has grown steadily in the Region, up to its current number from roughly 1.2 million in 1990 (and from just over 10 percent of the Region's population in 1990 to just over 15 percent in 2015).

The current Regional Black (non-Hispanic) population is approximately 883,000, or 6.7 percent of the Regional population, having declined from its peak in 1990 of nearly 1 million residents. Since that time, this racial group has seen a steady decline in both its Regional population and share of the total population.

The current White (non-Hispanic) Regional population is roughly 4 million, or 30.6 percent of the total population. The group's population has declined steadily since 1990, down from its peak of 5.1 million (over 46 percent of the Regional population, the largest racial or ethnic group in the Region at that time).

Table IV.8 AFFH Table 2 –Demographic Trends Since 1990

Los Angeles-Long Beach-Anaheim Region 2017 HUD AFFH Online Mapping Tool

Dece/Ethnicity	1990)	2000		2010)
Race/Ethnicity	#	%	#	%	#	%
White, Non-Hispanic	5,192,678	46.1%	4,418,592	35.73%	4,056,820	31.6%
Black, Non-Hispanic	985,687	8.7%	944,111	7.6%	859,086	6.7%
Hispanic	3,863,073	34.3%	5,117,792	41.4%	5,700,862	44.4%
Asian or Pacific Islander, Non- Hispanic	1,168,698	10.4%	1,539,730	12.5%	1,888,969	14.7%
Native American, Non-Hispanic	39,699	.4%	34,023	.3%	25,102	.2%
National Origin						
Foreign-born	3,470,174	30.8%	4,299,343	34.8%	4,436,466	33.73%
LEP						
Limited English Proficiency	2,431,049	40.7%	3,132,672	27.4%	2,976,920	69.7%
Sex						
Male	5,633,183	50.0%	6,120,150	49.5%	6,328,434	49.3%
Female	5,640,537	50.0%	6,245,477	50.5%	6,500,403	50.7%
Age						
Under 18	2,911,209	25.8%	3,436,395	27.8%	3,138,867	24.5%
18-64	7,287,854	64.6%	7,721,796	62.4%	8,274,594	64.5%
65+	1,074,657	9.5%	1,207,436	9.8%	1,415,376	11.0%
Family Type						
Families with children	1,318,546	34.5%	1,672,017	41.1%	1,388,564	32.8%

Residents of the Region born outside the United States are predominantly from Mexico, with a total of just over 1.7 million residents (see Table IV.9 below). The next largest national origins are The Philippines (294,000), El Salvador (282,000), Vietnam (238,000), and Korea (225,000). Foreign-born residents in the region have steadily increased since 1990, up from nearly 3.5 million (31 percent of the total population) to the current number, 4.4 million, or 34.3 percent of the regional population.

Of all residents with Limited English Proficiency (LEP), the most commonly-spoken language in the region is Spanish, with nearly 2 million native speakers (see Table IV.9 below). The next 3 most-commonly spoken languages in the region are Chinese (nearly 255,000 speakers), Korean (roughly 156,000 speakers), and Vietnamese (roughly 150,000 speakers). Currently, LEP residents number just over 3 million, or 23.5 percent of the regional population. This number has dipped slightly since 2010, but has grown by over 24 percent since 1990, when LEP residents totaled 2.4 million in the region.

Of all disability types listed, the most common in the Region was ambulatory difficulty, with nearly 665,000 residents claiming to have this type (see Table IV.9 below). This number represents 5.3 percent of the total regional population. The second most-common disability reported was independent living difficulty, with a total of roughly 516,000 or 5.1 percent of the total Regional population.

Families with children in the Region total nearly 1.4 million (see Table IV.9 below). This number rose slightly from 1990 to 2000 (1.3 million to 1.7 million), but the number has fallen overall since that time.

Table IV.9 AFFH Table 1 – Select Demographics

Los Angeles-Long Beach-Anaheim Region 2017 HUD AFFH Data

National Origin	Country		
#1 country of origin	Mexico	1,718,298	13.1%
#2 country of origin	Philippines	294,599	2.2%
#3 country of origin	El Salvador	282,311	2.1%
#4 country of origin	Vietnam	238,333	1.8%
#5 country of origin	Korea	224,787	1.7%
, ,	China excluding Hong Kong		
#6 country of origin	and Taiwan	197,101	1.5%
#7 country of origin	Guatemala	189,452	1.4%
#8 country of origin	Iran	136,109	1.0%
#9 country of origin	Taiwan	87,312	.7%
#10 country of origin	India	83,826	.6%
Limited English Proficiency (LEP)			
Language	Language		
#1 LEP Language	Spanish	1,970,148	16.0%
#2 LEP Language	Chinese	254,682	2.1%
#3 LEP Language	Korean	155,641	1.3%
#4 LEP Language	Vietnamese	149,579	1.2%
#5 LEP Language	Tagalog	86,250	.7%
#6 LEP Language	Armenian	85,608	.7%
#7 LEP Language	Persian	42,504	.3%
#8 LEP Language	Japanese	33,228	.3%
#9 LEP Language	Russian	27,784	.2%
#10 LEP Language	Arabic	24,662	.2%
Disability Type			
Hearing difficulty		317,972	2.4%
Vision difficulty		239,512	1.8%
Cognitive difficulty		467,299	3.8%
Ambulatory difficulty		664,933	5.4%
Self-care difficulty		324,339	2.7%
Independent living difficulty		516,033	5.1%

HOMEOWNERS & RENTERS

Service Area

The majority of the service area occupied housing units were renters in 2015, as shown below in Table IV.10. The 2015 ACS shows that 54 percent of occupied units were rented, which is one and a half percentage points higher than five years prior in the 2010 Census. Occupied units have fallen steadily from 1990 to 2015 (as a percent of all housing units), down just over two percentage points since then. Vacant housing units fell sharply in 2000, but rose by an even greater number in 2010, and have continued to increase in the 2015 Five-Year ACS. The number of total housing units in the service area has grown steadily since the 1990 Census, up to roughly 3.16 million units from 2.86 million, a growth of about 10.4 percent.

Table IV.10 Housing Units by Tenure

Los Angeles County Service Area 1990 - 2010 Census & 2015 Five-Year ACS Data

Tenure	1990 (1990 Census		2000 Census		2010 Census		2015 Five-Year ACS	
	Units	% of Total							
Occupied Housing Units	2,704,277	94.4%	2,836,509	95.7%	2,940,985	94.0%	2,963,160	93.7%	
Owner-Occupied	1,304,148	48.2%	1,358,108	47.9%	1,402,517	47.7%	1,364,118	46.0%	
Renter-Occupied	1,400,129	51.8%	1,478,401	52.1%	1,538,468	52.3%	1,599,042	54.0%	
Vacant Housing Units	160,088	5.6%	126,645	4.3%	188,475	6.0%	197,885	6.3%	
Total Housing Units	2,864,365	100.0%	2,963,154	100.0%	3,129,460	100.0%	3,161,045	100.0%	

Table IV.11 shows the disposition of vacant housing units since 2000 and the fact that, since then, the "other vacant" category has exhibited the largest growth, up nearly 129 percent over the 15-year period. Map IV.4, below, shows these other vacant units in the service area.

Table IV.11
Disposition of Vacant Housing Units

Los Angeles County Service Area 2000, 2010 Census & 2015 Five-Year ACS Data

Disposition	2000	2000 Census		2010 Census		e-Year ACS
	Units	% of Total	Units	% of Total	Units	% of Total
For Rent	52,023	41.1%	96,452	51.2%	62,428	31.5%
For Sale	21,612	17.1%	24,544	13.0%	18,132	9.2%
Rented or Sold, Not Occupied	10,943	8.6%	10,789	5.7%	21,961	11.1%
For Seasonal, Recreational, or Occasional Use	12,432	9.8%	18,096	9.6%	27,604	13.9%
For Migrant Workers	64	0.1%	105	0.1%	142	.1%
Other Vacant	29,571	23.3%	38,489	20.4%	67,618	34.2%
Total Housing Units	126,645	100.0%	188,475	100.0%	197,885	100.0%

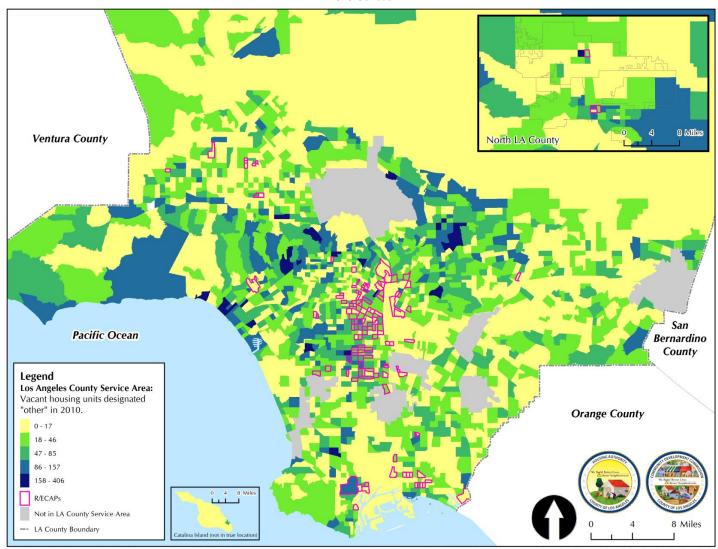
Starting with Map IV.5 on page 80, renter- and owner-occupied housing units are mapped by Census tracts per the 2000 Census and 2015 Five-Year ACS. As seen there, renter-occupied units dominate the areas around downtown Los Angeles and, to a lesser extent, the areas around Long Beach, Santa Monica, and Los Angeles International Airport. Most of the R/ECAP Census tracts in the service area are dominated by renter-occupied housing, indicating a need to produce more rental housing outside R/ECAPs and more homeownership in R/ECAP areas.¹⁹

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¹⁹ Tenure data from the 1990 Census is not included in this analysis due to the lack of shapefile data available from the Census Bureau from that vintage.

Map IV.4 Vacant Housing Units Designated as "Other Vacant" (2010)
Los Angeles County Service Area

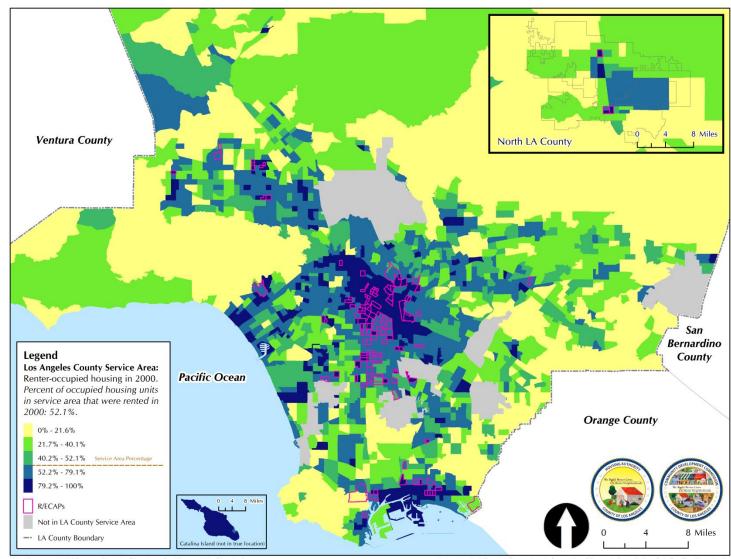
2010 Census



Data Sources: 2010 Census, County of Los Angeles, Census Tigerline, Esri

Map IV.5 Renter-Occupied Housing Units (2000)
Los Angeles County Service Area

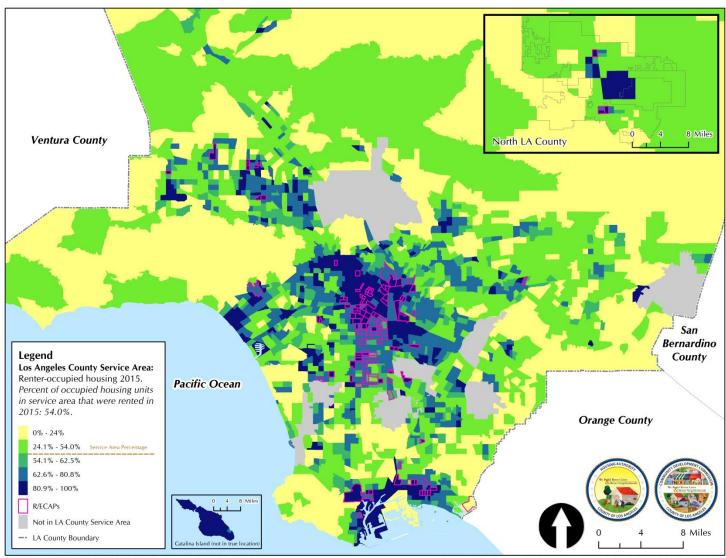
2000 Census



Data Sources: 2000 Census, County of Los Angeles, Census Tigerline, Esri

Map IV.6 Renter-Occupied Housing Units (2015)
Los Angeles County Service Area

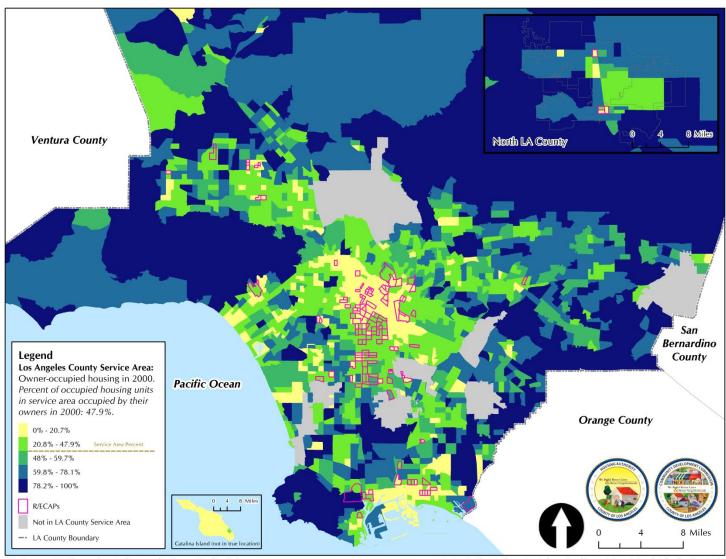
2015 Five-Year ACS



Data Sources: 2015 Five-Year ACS, County of Los Angeles, Census Tigerline, Esri

Map IV.7 Owner-Occupied Housing Units (2000)
Los Angeles County Service Area

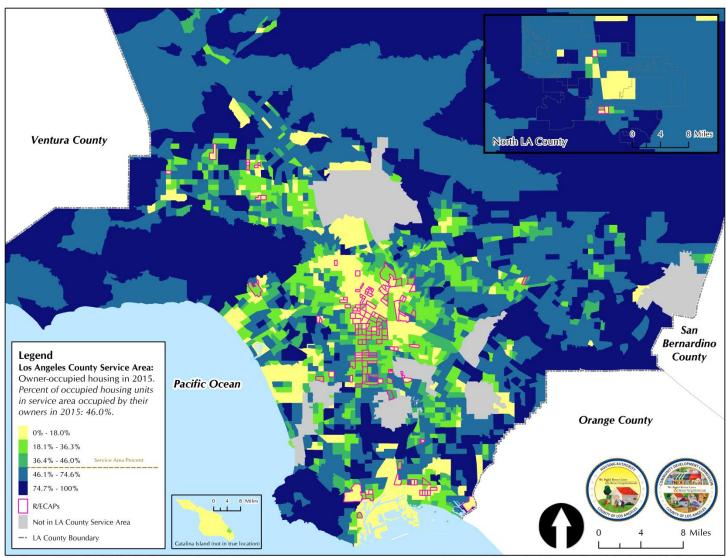
2000 Census



Data Sources: 2000 Census, County of Los Angeles, Census Tigerline, Esri

Map IV.8 Owner-Occupied Housing Units (2015)
Los Angeles County Service Area

2015 Five-Year ACS



Data Sources: 2015 Five-Year ACS, County of Los Angeles, Census Tigerline, Esri

Region

In the Los Angeles-Long Beach-Anaheim Region of Orange and Los Angeles Counties, the majority of occupied housing units belonged to renters of those units – but not by much. In the recent 2015 estimate, renters comprised just over half (51.3 percent) of occupied housing units, while five years prior, they occupied just under half (49.6 percent) of occupied housing units (see Table IV.12 below).²⁰

Table IV.12
Housing Units by Tenure
Los Angeles-Long Beach-Anaheim Region
2010 Census & 2015 Five-Year ACS Data

Tenure	2000 0	2000 Census		2010 Census		e-Year ACS
	Units	% of Total	Units	% of Total	Units	% of Total
Occupied Housing Units	4,069,061	96.0%	4,233,985	94.2%	4,272,422	94.1%
Owner-Occupied	2,074,200	51.0%	2,133,062	50.4%	2,082,030	48.7%
Renter-Occupied	1,994,861	49.0%	2,100,923	49.6%	2,190,392	51.3%
Vacant Housing Units	171,332	4.0%	259,998	5.8%	268,938	5.9%
Total Housing Units	4,240,393	100.0%	4,493,983	100.0%	4,541,360	100.0%

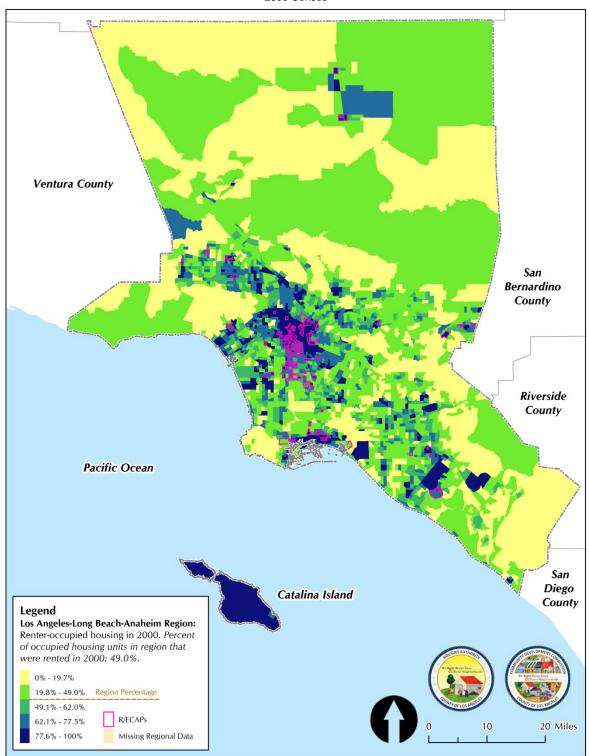
This flip of majority tenure occurred sometime between 2010 and 2015, and when more historic data is considered, a trend emerges. While slight, the 2000 Census reveals that an even greater proportion of residents living in housing units were owners than there were in 2010. These data show a trajectory of declining owner-occupied housing units, where a greater number of residents, either by choice or necessity, are opting to rent and not own. There does appear to be a sharp rise in vacant housing units from 2000 to 2010 (up nearly 52 percent), which seems to level out by 2015.

The following four maps, shown below, display renter- and owner-occupied housing units by Census tracts in the Region according to the 2000 Census and 2015 Five-Year ACS. Renter-occupied units dominate the areas around the Los Angeles urban core and, to a lesser extent, Long Beach and central Orange County. Ownership rates in Central Orange County appear to have risen slightly from during this period. Most of the R/ECAP Census tracts in the region are dominated by high percentages of renter-occupied housing, indicating that these units service largely segregated communities.

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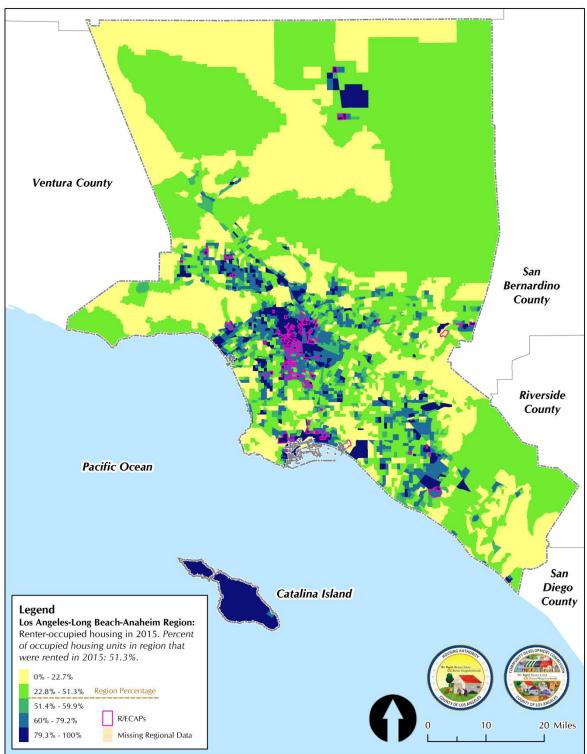
 $^{^{20}}$ Tenure data from the 1990 Census was not available for Orange County, so that vintage is not included in the regional analysis.

Map IV.9 Renter-Occupied Housing Units (2000)
Los Angeles-Long Beach-Anaheim Region
2000 Census



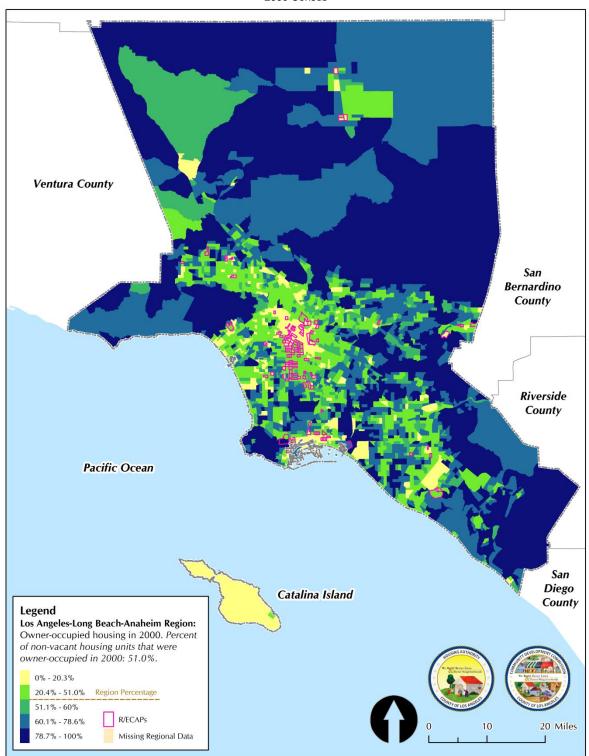
Data Sources: 2000 Census, County of Los Angeles, Census Tigerline, Esri

Map IV.10 Renter-Occupied Housing Units (2015)
Los Angeles-Long Beach-Anaheim Region
2015 Five-Year ACS



Data Sources: 2015 Five-Year ACS, County of Los Angeles, Census Tigerline, Esri

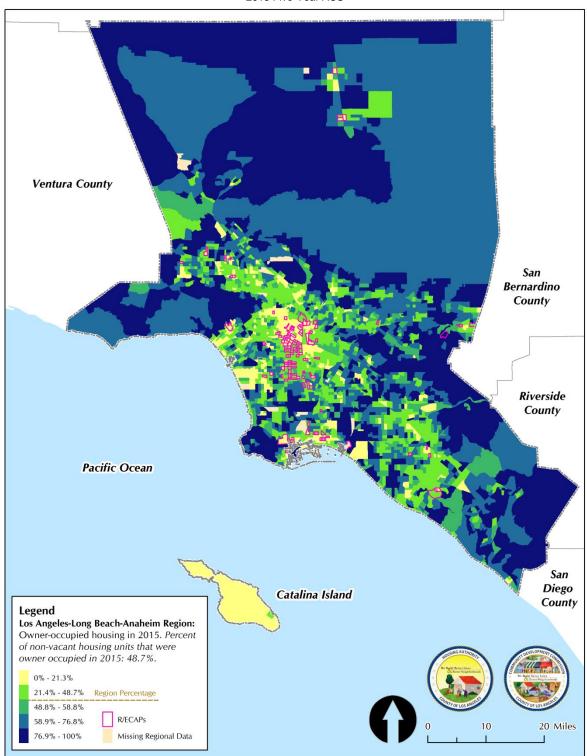
Map IV.11 Owner-Occupied Housing Units (2000)
Los Angeles-Long Beach-Anaheim Region
2000 Census



Data Sources: 2000 Census, County of Los Angeles, Census Tigerline, Esri

Map IV.12 Owner-Occupied Housing Units (2015)

Los Angeles-Long Beach-Anaheim Region 2015 Five-Year ACS



Data Sources: 2015 Five-Year ACS, County of Los Angeles, Census Tigerline, Esri

B. SEGREGATION/INTEGRATION

DISSIMILARITY INDEX

The "dissimilarity index" provides a quantitative measure of segregation in an area, based on the demographic composition of smaller geographic units within that area. One way of understanding the index is that it indicates how evenly two demographic groups are distributed throughout an area: if the composition of both groups in each geographic unit (e.g., Census tract) is the same as in the area as a whole (e.g., county), then the dissimilarity index score for that entire area will be 0. By contrast, and again using Census tracts as an example, if one population is clustered entirely within one Census tract, the dissimilarity index score for that entire area will be 1. The higher the dissimilarity index value, the higher the level of segregation in an area. Table IV.13 below demonstrates how HUD views various levels of the index.²¹

Table IV.13
Dissimilarity Index Values

Measure	Values	Description
Dissimilarity Index	<40	Low Segregation
[range 0-100]	40-54	Moderate Segregation
	>55	High Segregation

SEGREGATION LEVELS

Service Area

For the Los Angeles County Service Area, the Dissimilarity Index shows a mix of moderate and high levels of segregation between the racial or ethnic groups presented (see Table IV.14 below). In 2015, Asian (non-Hispanic) populations show the lowest race-specific levels of segregation with Whites (non-Hispanic) with an index of just below 50. Blacks (non-Hispanic) have the highest levels of segregation with Whites with an index of 67.2, while Hispanics can be shown to have the next-highest index at 62.7. The Non-White and White populations show a segregation index of 55.6, indicating a high level of segregation within the service area.

Table IV.14
AFFH Table 3 – Racial or Ethnic Dissimilarity Trends

Los Angeles County Service Area 2010 Decennial Census

	Los Angeles County Service Area						
Dissimilarity Index	1990	2000	2010	2015			
Non-White/White	56.60	56.09	56.61	55.60			
Black/White	72.96	67.36	67.12	67.21			
Hispanic/White	60.86	63.02	63.63	62.72			
Asian or Pacific Islander/White	46.09	48.17	50.21	49.97			

²¹ The dissimilarity indices included in this study were calculated from data provided by the Census Bureau according to a formula that factors in a particular geographic unit, the jurisdiction, and the two groups of interest. In most respects (including use of tract-level data available through the Brown Longitudinal Tract Database), the methodology employed in this study exactly duplicates HUD's methodology for calculating the index of dissimilarity. The principle exception was the decision to use Census tract-level data to calculate dissimilarity index values through 2010 (While HUD uses tract level data in 1990 and 2000, the agency uses block group-level data in 2010). The decision to use tract-level data in all years included in the study was motivated by the fact that the dissimilarity index is sensitive to the geographic base unit from which it is calculated. Concretely, use of smaller geographic units produces dissimilarity index values that tend to be higher than those calculated from larger geographic units (borrowed from Wong, David S. "Spatial Decomposition of Segregation Indices: A Framework Toward Measuring Segregation at Multiple Levels." Geographical Analyses, 35:3. The Ohio State University. July 2003. P. 179.)

Region

For the Los Angeles-Long Beach-Anaheim Region of Orange and Los Angeles Counties, Black/White segregation is highest among all groups with a Dissimilarity Index value of 68.9, while the Hispanic/White value is second-highest at 63.5 (see Table IV.15 below). Both values indicate a high level of segregation within the region. Non-White/White segregation was on the cusp of high segregation with a value of 56.9, while Asian/White index value was 49.8, indicating a moderate level of segregation for the region.

Table IV.15
AFFH Table 3 – Racial or Ethnic Dissimilarity Trends

Los Angeles-Long Beach-Anaheim Region 2017 HUD AFFH Online Mapping Tool

2011 110D 7 11 11 Offinio Mapping 1001				
	Los A	Los Angeles-Long Beach-Anaheim Region		
Dissimilarity Index	1990	2000	2010	2015
Non-White/White	55.32	55.50	54.64	56.94
Black/White	72.75	68.12	65.22	68.85
Hispanic/White	60.12	62.44	62.15	63.49
Asian or Pacific Islander/White	43.46	46.02	45.77	49.78

SEGREGATION TRENDS (SINCE 1990)

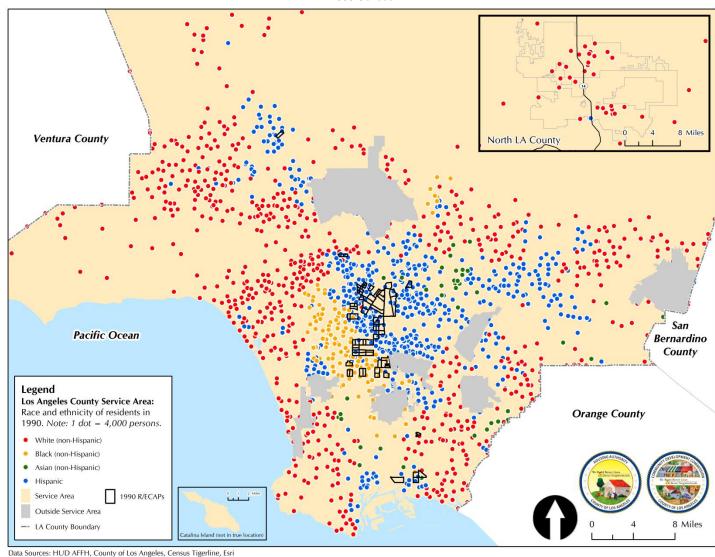
Service Area

For the service area, the Non-White/White Dissimilarity Index has remained fairly consistent since 1990, dropping a single point value since then (see Table IV.14 on page 89). These numbers ensure the Non-White/White index values have been hovering just inside the "high segregation" thresholds since 1990. The Black/White index value peaked in 1990 with a value of nearly 73, but has fallen and remained steady near a value of 67 since that time. The Hispanic/White index value has fallen nearly a full point value since 2010, but is nearly two full point values higher than it was in 1990. Finally, the Asian/White index value has risen steadily since its 1990 value of just over 46 to a peak of 50.21 in 2010; 2015 is the first year the index has fallen in value (down about one-quarter of a value point).

See Map IV.13 through Map IV.15 below for racial/ethnic population dot densities in the service area from 1990, 2000, and 2010, respectively.²²

 $^{^{22}}$ As Census tract boundaries in LA County have been redrawn each decade since 1990 (i.e., they have shrunk in geographic size), the dot value in the final (2010) map has been shifted from 1 dot = 4,000 persons to 1 dot = 2,000 persons to help compensate.

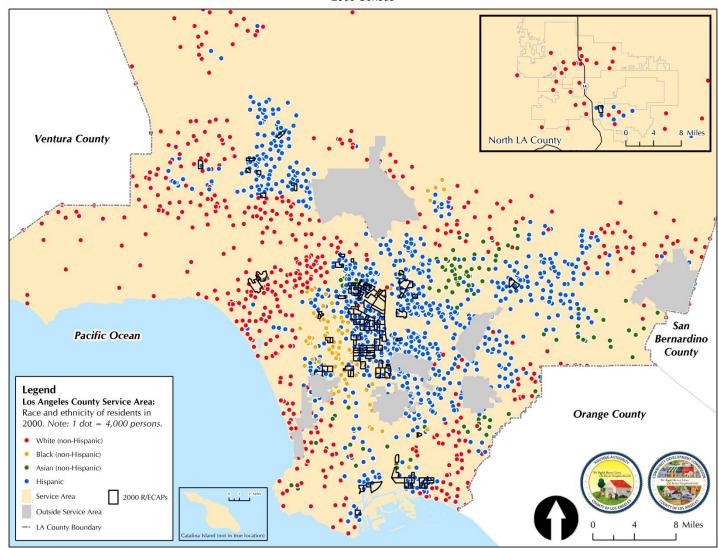
Map IV.13 Racial/Ethnic Dot Density, 1990 Los Angeles County Service Area 1990 Census



2017 Assessment of Fair Housing For the CDC and HACoLA

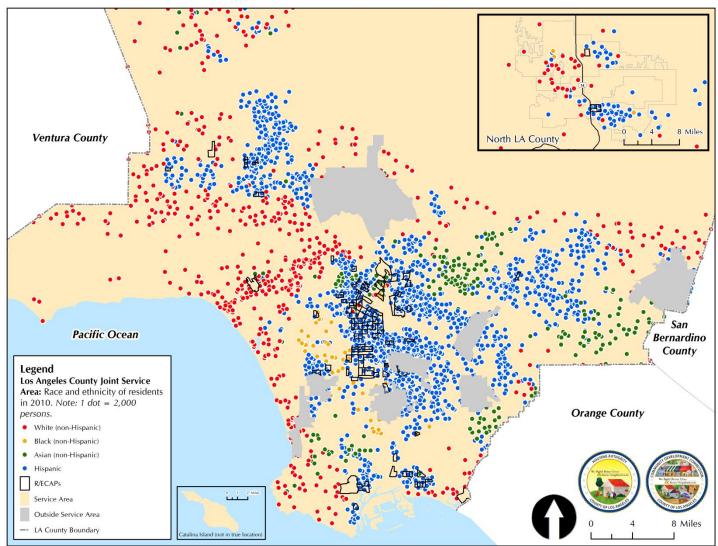
Map IV.14 Racial/Ethnic Dot Density, 2000 Los Angeles County Service Area

2000 Census



Map IV.15 Racial/Ethnic Dot Density, 2010 Los Angeles County Service Area

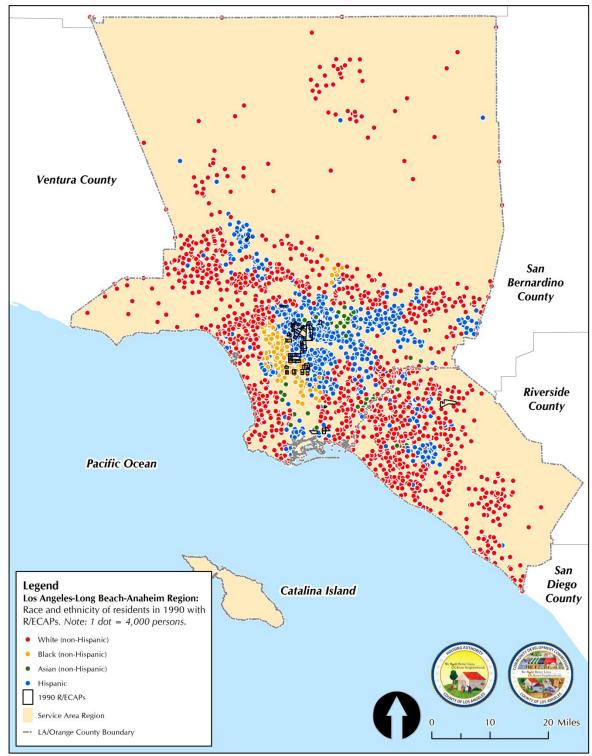
2010 Census



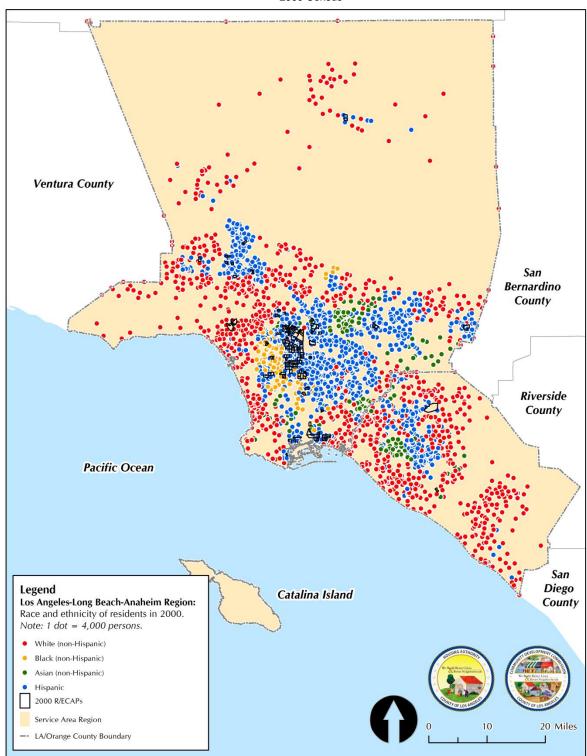
Region

The highest Dissimilarity Index values in the region occurred among the Black/White racial category, reaching a peak of 72.3 in 1990 (see Table IV.15 on page 90). That number, as with the segregation examples above, has fallen from 1990 to 2010, but has since rise slightly. The Hispanic/White and Asian/White index values have risen slightly since 1990, from 60.1 to 63.5 and from 43.5 to 49.8, respectively. The Non-White/White index value has remained constant dating back to 1990 – the value was 55.3 at the time and currently stands at 56.9 with little fluctuation in-between. Map IV.16 and Map IV.17, below, show racial or ethnic population dot densities in the region from the 1990 and 2000 Census, respectively.

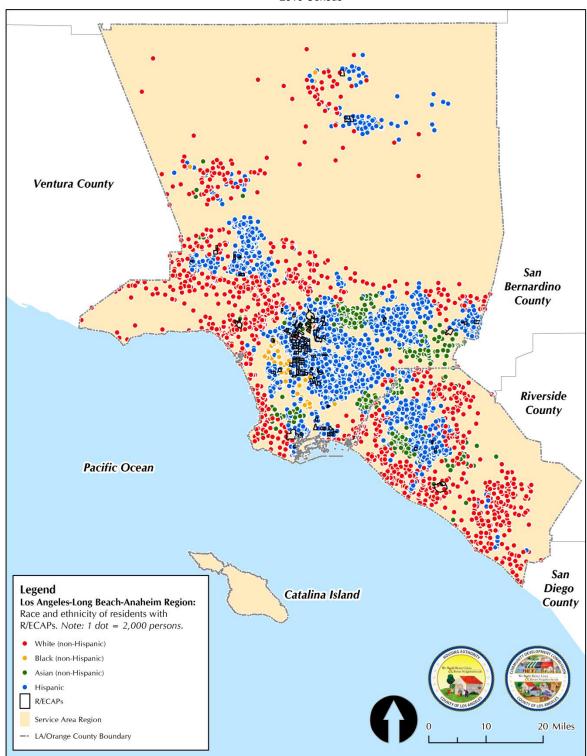
Map IV.16 Racial/Ethnic Dot Density, 1990 Los Angeles-Long Beach-Anaheim Region 1990 Census



Map IV.17 Racial/Ethnic Dot Density, 2000 Los Angeles-Long Beach-Anaheim Region 2000 Census



Map IV.18 Racial/Ethnic Dot Density, 2010 Los Angeles-Long Beach-Anaheim Region 2010 Census



GEOGRAPHY OF SEGREGATION

Service Area

For the Los Angeles County service area, the largest demographic clusters appear in East Los Angeles, Bell Gardens, Maywood, and Florence-Firestone, in Los Angeles south of the downtown area, San Fernando, and Palmdale, where Hispanic populations can be found in large numbers (see Map IV.21 below).

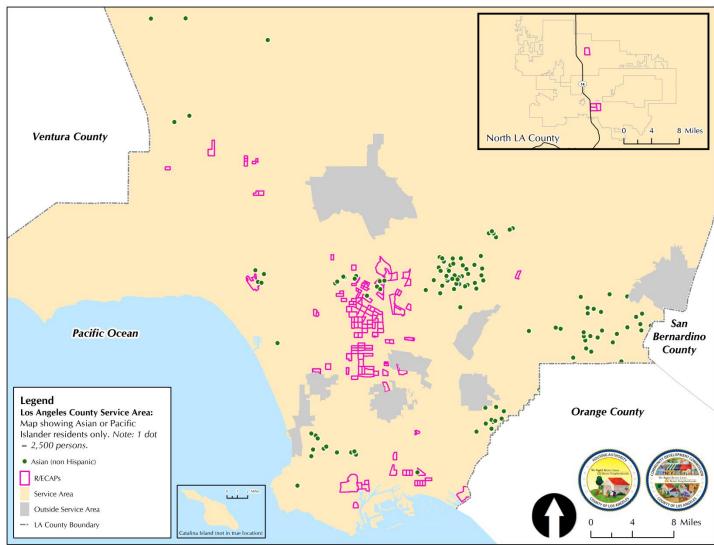
Cities such Cerritos, Diamond Bar, and San Gabriel contain high concentrations of Asian (non-Hispanic) residents, as do Alhambra, Rosemead, and the Koreatown neighborhood west of Downtown Los Angeles (see Map IV.19 below). The communities with the largest Black (non-Hispanic) populations are Athens-Westmont View Park/Windsor Hills, Carson, and unincorporated areas to the south and southeast of Downtown Los Angeles (see Map IV.20 below). Claremont, West Hollywood, and Calabasas contain the highest clusters of White (non-Hispanic) residents.

The highest concentrations of Mexican-born residents in the service area appear in unincorporated East Los Angeles; the city cluster of Bell, Bell Gardens, and Maywood; unincorporated Florence-Firestone; San Fernando; and in La Puente and the surrounding unincorporated areas (see Map IV.22 below). The next most-common nation of origin for residents in the Urban County is China, with the largest concentrations occurring in San Gabriel, unincorporated Northeast San Gabriel, and Arcadia. There are also smaller pockets near Diamond Bar in unincorporated Rowland Heights.

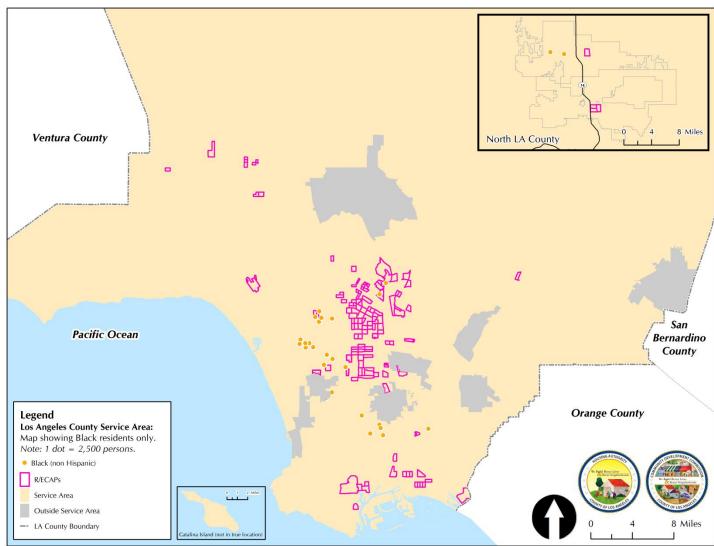
The highest concentrations of Spanish-speaking residents align obviously very closely with those born in Mexico, as shown below on Map IV.23. Thus, they can be found in East Los Angeles; the city cluster of Bell, Bell Gardens, and Maywood; unincorporated Florence-Firestone, San Fernando; and in La Puente and the surrounding unincorporated areas. Similarly, LEP residents speaking Chinese can be found near those born in China, with the highest concentrations of Chinese speakers occurring in in San Gabriel, unincorporated Northeast San Gabriel, and Arcadia. There are also smaller pockets near Diamond Bar in unincorporated Rowland Heights.

The 10 maps beginning with Map IV.24 on page 104 show these same data but for the HACoLA service area only (Map IV.24 through Map IV.28) and for the Los Angeles Urban County only (Map IV.29 through Map IV.33). While there is certainly much overlap with the HACoLA service area and the combined service areas, the Urban County (or CDC service area) shows some distinction, thanks in large part to a much larger proportion of area that is *outside* the CDC service area. For instance, much of the Asian population in the Urban County lies to the southeastern border, near Orange County (see Map IV.29 on page 109). This is in contrast to the Asian population in the LA County service area, where the largest clusters are near East Los Angeles and Monterey Park (areas outside the CDC service area).

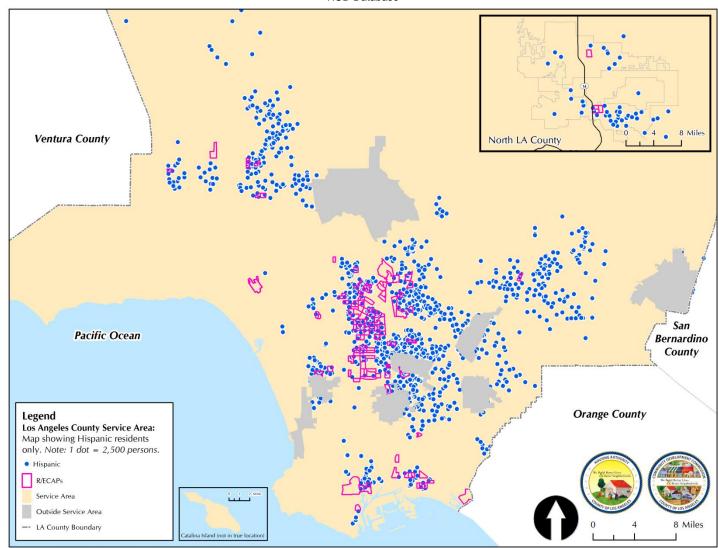
Map IV.19 Asian Population Dot Density
Los Angeles County Service Area
HUD Database



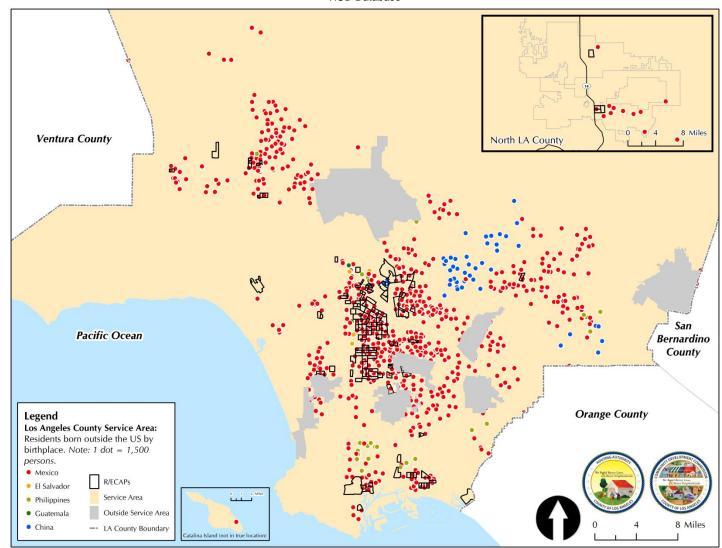
Map IV.20
Black Population Dot Density
Los Angeles County Service Area
HUD Database



Map IV.21
Hispanic Population Dot Density
Los Angeles County Service Area
HUD Database



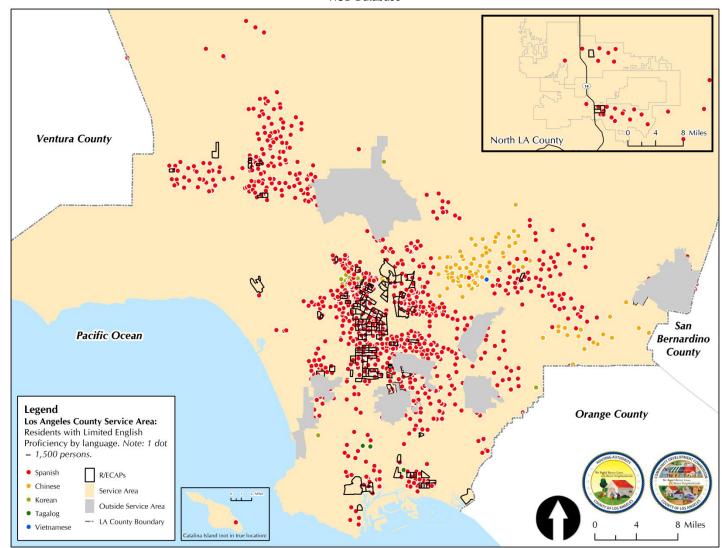
Map IV.22
Foreign-Born Residents Dot Density with R/ECAP Areas
Los Angeles County Service Area
HUD Database



Map IV.23 Residents with Limited English Proficiency (LEP) Dot Density with R/ECAP Areas

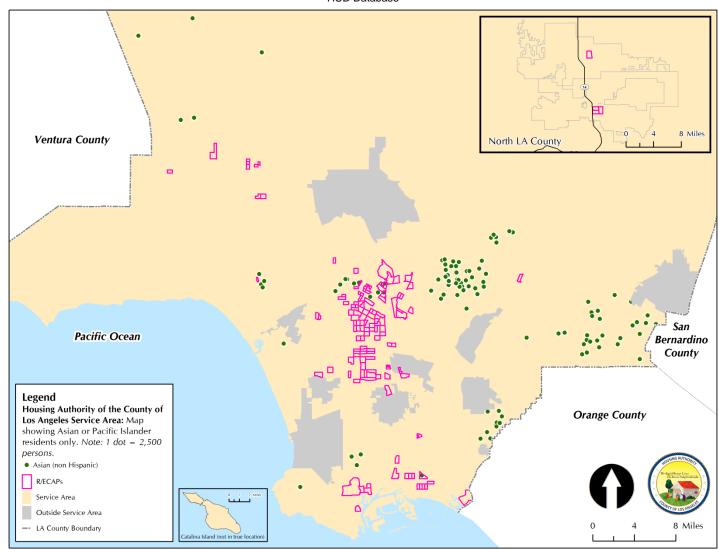
Los Angeles County Service Area

HUD Database



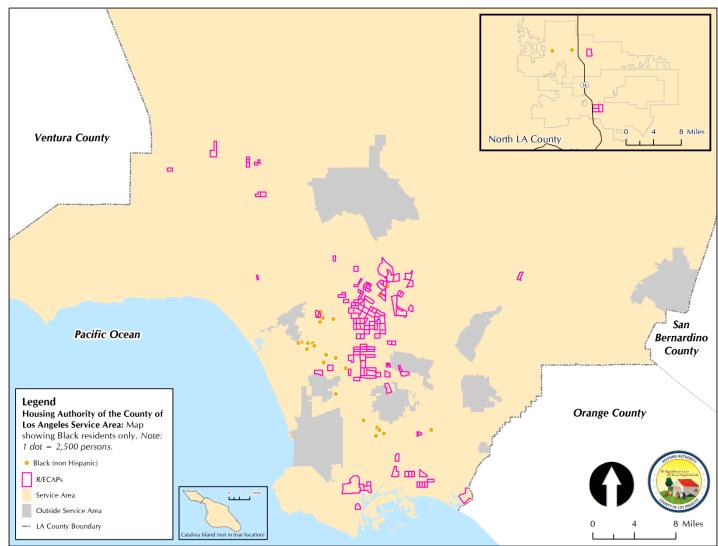
Map IV.24
Asian Population Dot Density
HACOLA Service Area

HUD Database

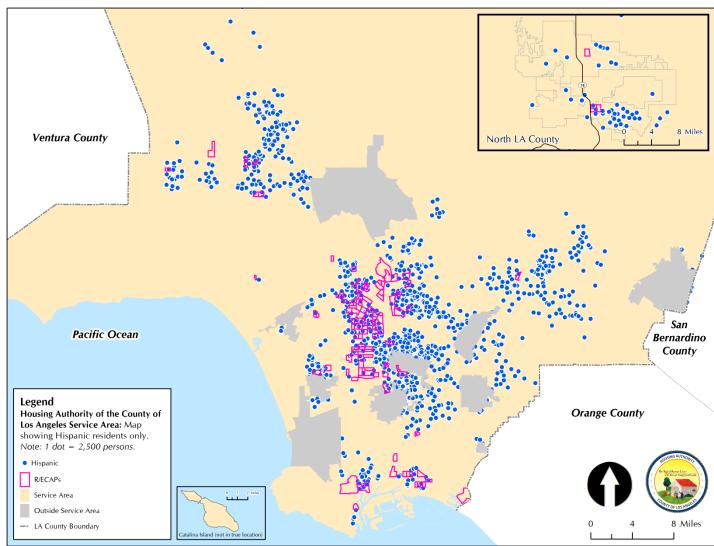


Map IV.25
Black Population Dot Density
HACOLA Service Area

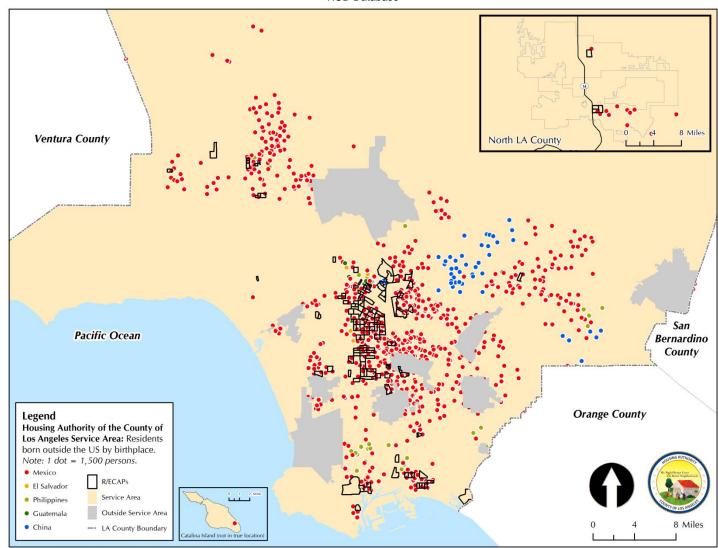
HUD Database



Map IV.26 Hispanic Population Dot Density HACoLA Service Area HUD Database



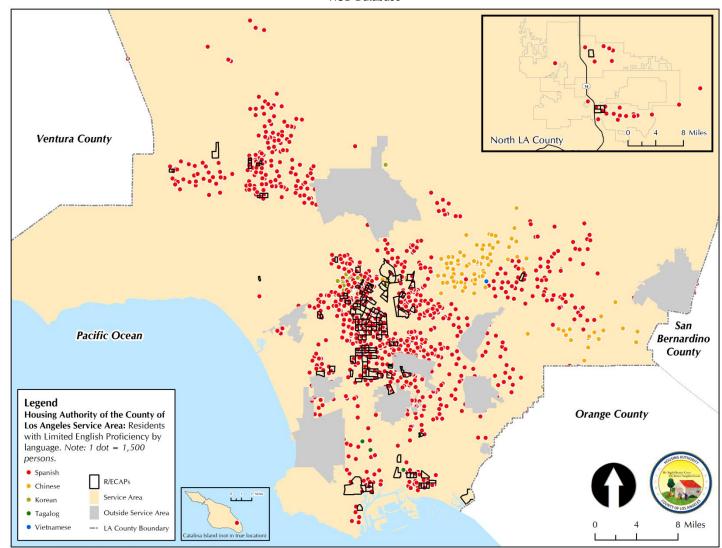
Map IV.27
Foreign-Born Residents Dot Density with R/ECAP Areas
HACoLA Service Area
HUD Database



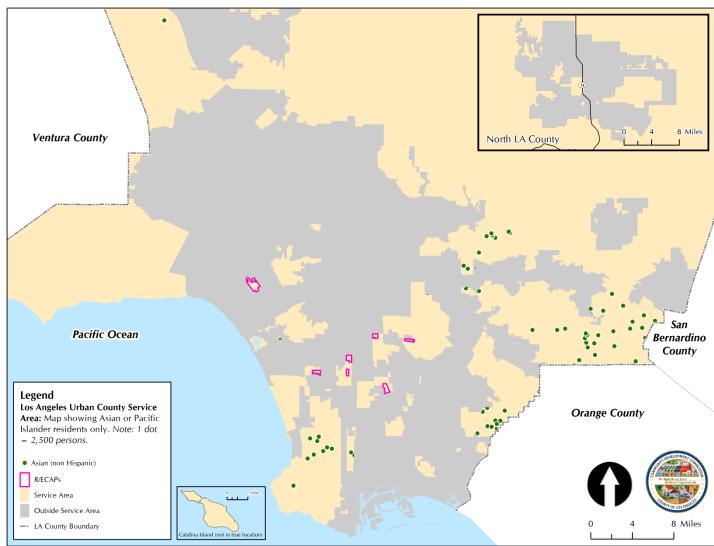
Map IV.28 Residents with Limited English Proficiency (LEP) Dot Density with R/ECAP Areas

HACOLA Service Area

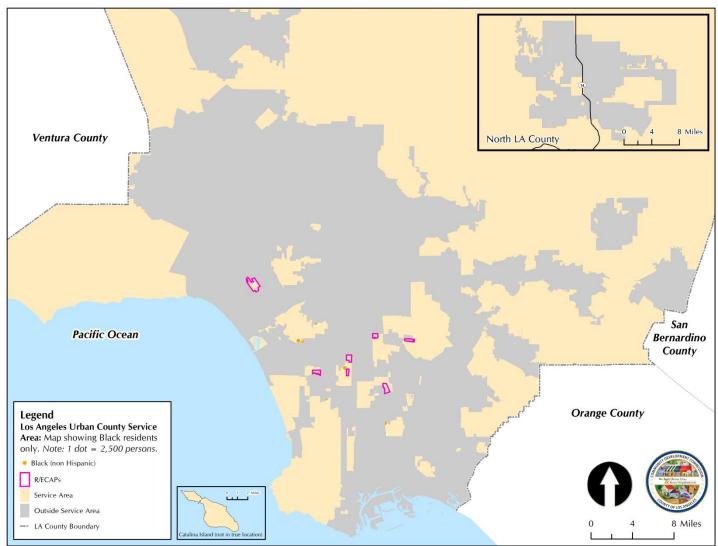
HUD Database



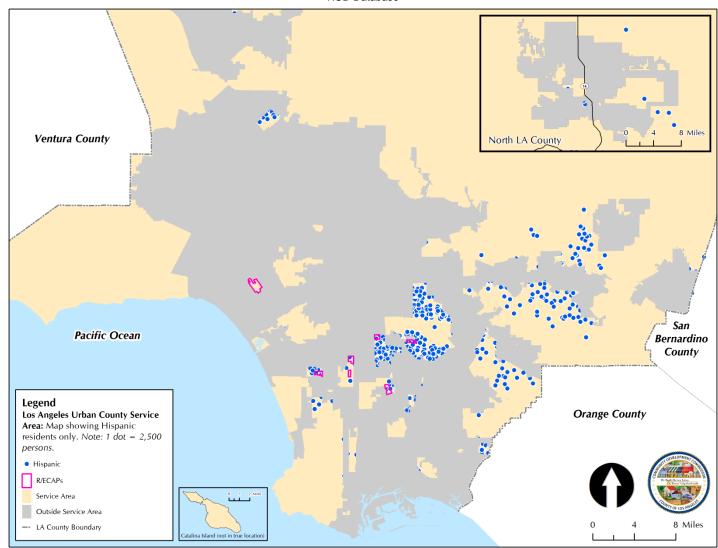
Map IV.29
Asian Population Dot Density
Los Angeles Urban County
HUD Database



Map IV.30
Black Population Dot Density
Los Angeles Urban County
HUD Database



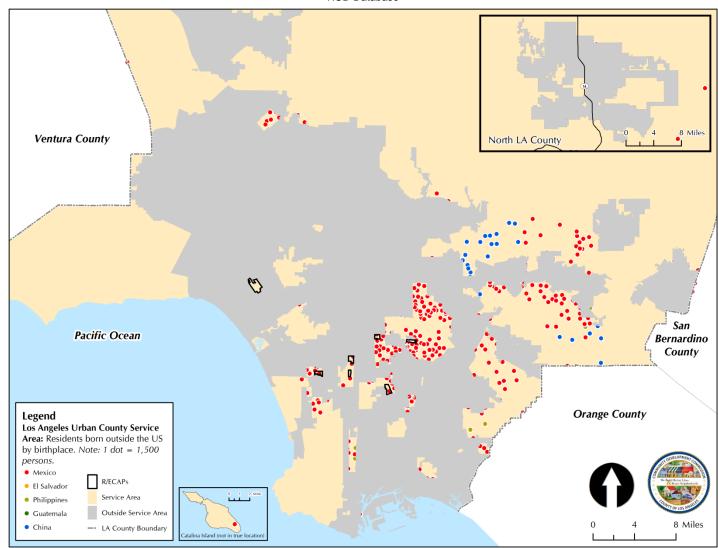
Map IV.31
Hispanic Population Dot Density
Los Angeles Urban County
HUD Database



Map IV.32 Foreign-Born Residents Dot Density with R/ECAP Areas

Los Angeles Urban County

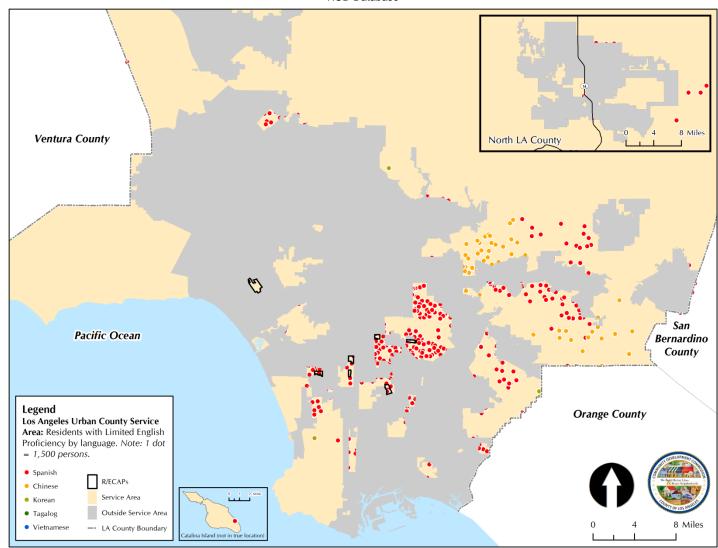
HUD Database



Map IV.33 Residents with Limited English Proficiency (LEP) Dot Density with R/ECAP Areas

Los Angeles Urban County

HUD Database



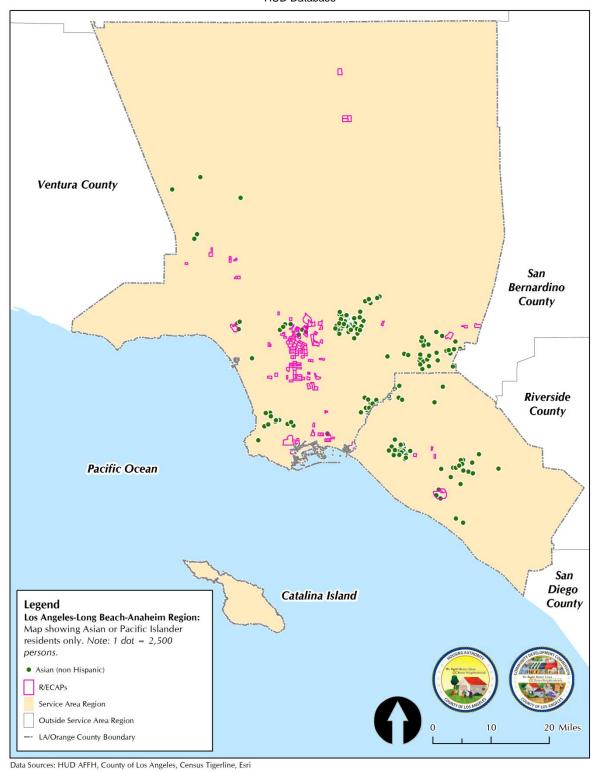
Region

Hispanic populations are most concentrated in and around South Los Angeles, to the north of Los Angeles near San Fernando, and in central Orange County near the city of Santa Ana (see Map IV.36 below). Asian (non-Hispanic) populations are most concentrated just east of Downtown Los Angeles and in East Los Angeles, near Alhambra and Monterey Park (see Map IV.34 below); this racial group has seen the most pronounced growth in Central Orange County and East Los Angeles since 1990. The largest Black (non-Hispanic) populations can be found in South Los Angeles and unincorporated areas nearby, such as Athens-Westmont and View Park/Windsor Hills (see Map IV.35 below). White (non-Hispanic) populations tend to have highest concentrations near the coast and, to a lesser degree, along the Interstate 210 Corridor, south of the San Gabriel Mountains.

Mexican-born residents are clustered in a few distinct areas around the region: near downtown Los Angeles, in and around San Fernando, in east Los Angeles County near Pomona, and north-central Orange County near the cities of Santa Ana and Anaheim (see Map IV.52 below). Other prominent nations of origin represented in the region include Chinese-born residents just east of Los Angeles near the cities of Alhambra and Monterey Park; and Filipinos are geographically represented in the areas south of Los Angeles near Torrance and Carson.

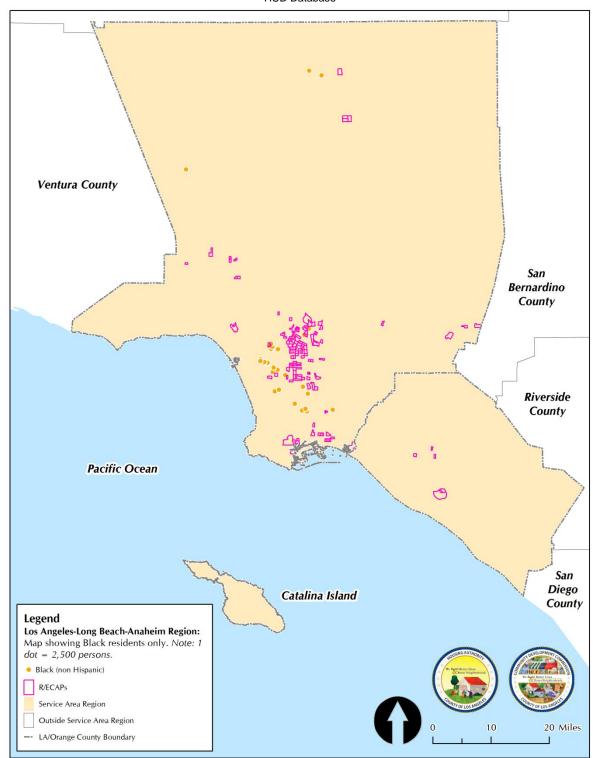
Native Spanish-speaking residents tended to be clustered near those born in Mexico, as was the case in the service area (see Map IV.53 below for dispersion of LEP residents). Similarly, Chinese-speakers were obviously overlapping with those born in China, clustered largely in Alhambra and Monterey Park. Perhaps more surprisingly, there is a large population of Vietnamese-speaking residents in central Orange County near Santa Ana and Fountain Valley. Finally, there is a significant population of Korean-speaking residents at the border of Orange and Los Angeles County near the city of Buena Park.

Map IV.34 Asian Population Dot Density
Los Angeles-Long Beach-Anaheim Region
HUD Database

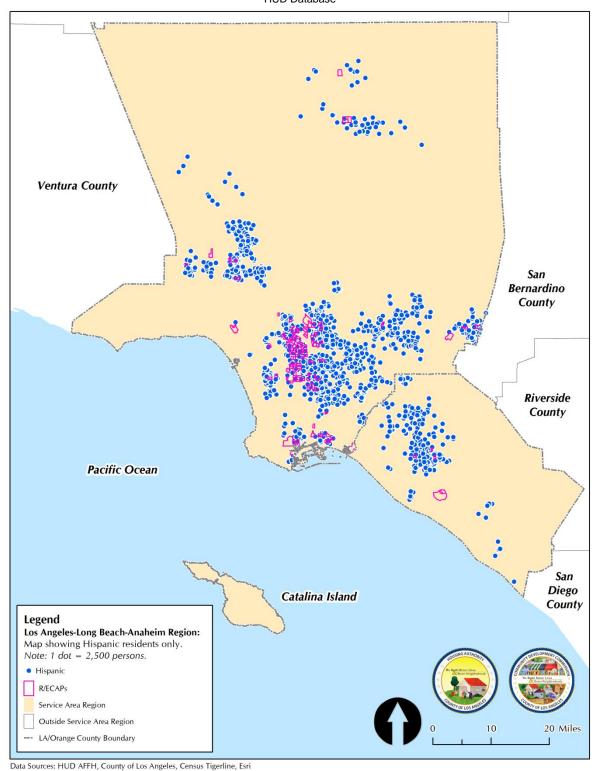


Map IV.35

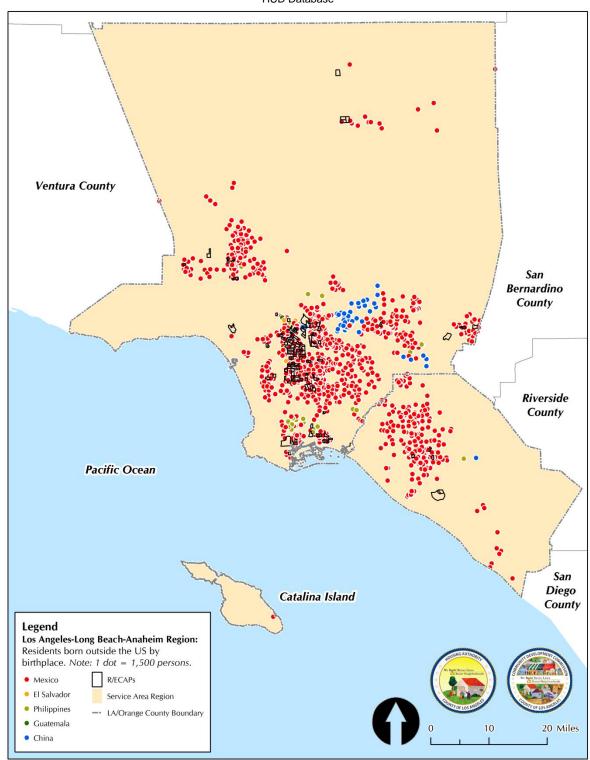
Black Population Dot Density
Los Angeles-Long Beach-Anaheim Region
HUD Database



Map IV.36 Hispanic Population Dot Density
Los Angeles-Long Beach-Anaheim Region
HUD Database



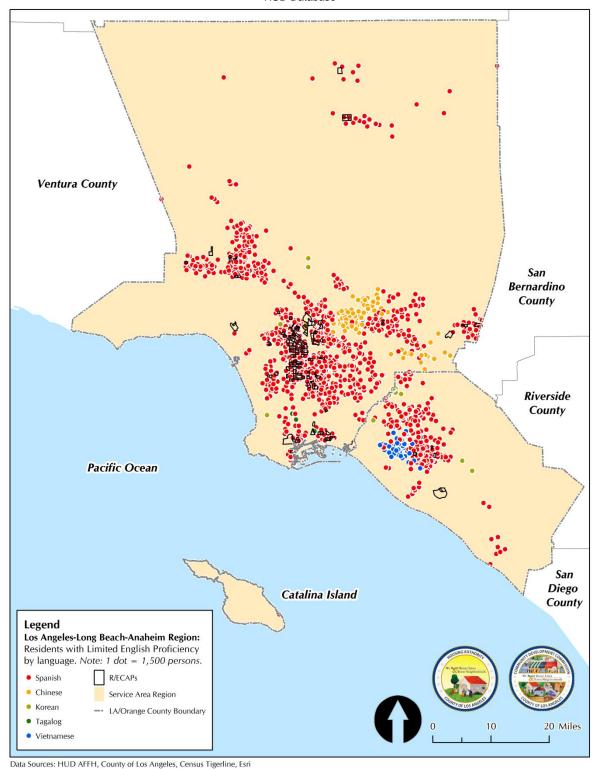
Map IV.37 Foreign-Born Residents Dot Density with R/ECAP Areas
Los Angeles-Long Beach-Anaheim Region
HUD Database



Map IV.38 Residents with Limited English Proficiency (LEP) Dot Density

Los Angeles-Long Beach-Anaheim Region

HUD Database



OWNER/RENTER SEGREGATION

As shown in Map IV.6 on page 81, renter-occupied housing in 2015 was primarily located in neighborhoods with a high number of R/ECAP Census tracts, which correspond closely with a high level of segregation. Additionally, Los Angeles and Long Beach have the highest dissimilarity index of any entitlements in the service area, and these two cities are also where the highest rates of renter-occupied housing can be found.

On the other hand, Map IV.8 on page 83 shows the opposite phenomenon: Census tracts with high concentrations of owner-occupied housing in 2015 were almost exclusively non-R/ECAP Census tracts, indicated these households are located in areas with lower levels of segregation. Correspondingly, the cities of Baldwin Park, Bellflower, Downey, and Paramount have among the lowest dissimilarity index in the service area and these cities contain much higher concentrations of owner-occupied housing than do Los Angeles or Long Beach.

TRENDS, POLICIES & PRACTICES

As discussed in the section describing contributing factors to segregation below, crime, development practices, and gentrification can all lead to greater segregation if not addressed carefully.

ADDITIONAL INFORMATION

No additional information to report.

CONTRIBUTING FACTORS TO SEGREGATION

Crime

Crime may be a serious contributing factor to segregation in the service area. Crime in the City of Los Angeles rose in all categories in 2015, according to the Los Angeles Police Department (LAPD).²³ Violent crimes increased 19.9 percent in 2015, and property crimes increased by 10.3 percent. LAPD also offered crime data by neighborhood.²⁴ In 2016, the most violent crimes per population were found in Chesterfield Square at a rate of 164.5 per 10,000, followed by Vermont Vista at 157.9, Harvard Park at 129.5, Green Meadows at 121.7, and Vermont Knolls at 120.7. The most property crimes per population were reported in Unincorporated Santa Susana Mountains at 424.3 per 10,000, followed by Rancho Dominguez at 407.8, Chesterfield Square at 335.3, Rancho Park at 331.4, and Elysian Park at 297.1.

Table IV.16, below, shows various crime categories and year over year change from 2015 and 2016 for Los Angeles County. Forcible rape constituted the largest increase in crime in 2015, but this crime dropped slightly in 2016, the only crime category presented below to do so. The largest crime category, theft, has remained at around the same growth rate for both years.

²³ http://www.latimes.com/local/crime/la-me-crime-stats-20151230-story.html

²⁴ http://maps.latimes.com/crime/

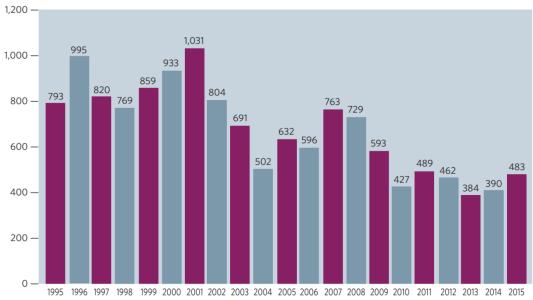
Table IV.16 2015-2016 Crime Statistics

Los Angeles County
Los Angeles County Sherriff's Department

Crime	2015	YoY % Change	2016	YoY % Change
Aggravated Assault	6,581	2.8%	6,977	6.0%
Burglary	13,019	3.6%	13,084	.5%
Grand theft auto	12,319	19.2%	12,929	5.0%
Homicide	192	17.8%	217	13.0%
Rape	789	53.8%	786	4%
Robbery	4,193	6.0%	4,760	13.5%
Theft	33,669	5.5%	35,931	6.7%

In 2015, the Los Angeles County Human Relations Commission released its 2015 Hate Crimes Report.²⁵ The report found that hate crimes had increased by 24 percent, while statewide hate crimes had increased by only ten percent.²⁶ Hate crimes motivated by sexual orientation comprised 25 percent of all hate crimes, while violence motivated by sexual orientation reached 84 percent; over half (58 percent) of hate crimes in the County were targeted at African Americans. The report stated that 71 percent of all religious crimes were anti-Jewish, while anti-Muslim hate crimes jumped from 3 to 19.²⁷ The highest crime rates per capita occurred near Downtown Los Angeles.²⁸ Diagram IV.1 below shows total hate crimes in the County dating back to 1995.

Diagram IV.1Hate Crimes By Year – Los Angeles County www.LAHumaneRelations.org/hatecrime/reports/2015



 $^{^{25} \} https://www.advancingjustice-la.org/media-and-publications/press-releases/significant-increase-number-anti-chinese-and-anti-muslim-hate\#.WltpShD3mHo$

²⁶ http://www.lahumanrelations.org/hatecrime/reports/2015%20Hate%20Crime%20Report%20PDF%20(1).pdf

²⁷ ibid.

²⁸ ibid.

Richard Winton of the *Los Angeles Times* cites a recent analysis showing that hate crimes increased by 15 percent in 2016 in the City.²⁹ The reported number of hate crimes reached a total of 230 last year, the highest number of such crimes since 2008. In particular, there was a spike in violence against individuals in the LGBTQ community, according to a study conducted by the Center for the Study of Hate and Extremism at Cal State San Bernardino. According to the study, African Americans were targeted most of any hate crime category, and over one-third of the 2016 hate crimes were motivated by race, religion, or sexual orientation.

UCLA TOD Study

In June 2015, UCLA released a report that analyzed the impact of transit-oriented development (TOD) in six communities in Los Angeles, all containing Metro rail stations built between 1990 and 2012.³⁰ A survey of over 600 rail user found that a majority used rail to commute to work, and half of riders were low-income. Findings from this survey were used to develop three strategies for equitable development near rail stations:

- City of Los Angeles should develop plans near transit stations to encourage new housing and preserve existing low-cost housing.
- City of Los Angeles should incentivize employers to implement public transit subsidy programs for workers who commute by transit.
- Metro should expand its public-private partnerships with community-based organizations or nonprofits to implement fare assistance programs to serve low-income clients.

The study also reviewed the commercial impact of new residents to TODs, who tend to be younger, non-Hispanic white or Asian and less likely to shop locally. The study proposed that community developers should: recognize the commercial sector as an important aspect of neighborhood change; acknowledge and preserve the diversity of TOD commercial districts; and protect community-serving retail. The impact of transit stations and the extent of gentrification were measured using observed signs of development and investment, using observational groundtruthing instruments. The study suggests that the following guidelines may be useful to identify inequitable development in the formal planning process:

- Stakeholders, such as community groups and city planners, should use groundtruthing in conjunction with secondary data that may not capture subtle characteristics of gentrification.
- Groundtruthing tools are most useful when they are context-sensitive and developed with stakeholder input who are familiar with a neighborhood and the perceived changes.
- Groundtruthing should be a longitudinal process to allow for comparative analysis based on a benchmark to allow for these changes to be quantified and taken into consideration in promoting equitable neighborhood development.

The study found that new residential and retail developments in TODs serve a different population than the previous establishments. While CBOs pursue opportunities to make TOD

²⁹ http://www.latimes.com/local/lanow/la-me-hate-crimes-20170405-story.html

³⁰ http://www.urbandisplacement.org/sites/default/files/images/spring 2015 tod.pdf

more equitable, they are often limited by restrictions placed by public agencies. While public agencies encourage TOD, these plans should be evaluated to meet the needs of the neighborhood. The study concludes with stating a need for a well-conceived, better coordinated, and adequately funded collaborative effort to promote equitable development around transit stations. It also notes that one key element to successful implementation is ongoing and real-time monitoring of changes and performance, using the findings to make any necessary modifications to policies, plans and programs in order to ensure equitable outcomes.

Preservation in Transit Oriented Development

In 2012, the City of Los Angeles and the Los Angeles Housing Department released a report entitled *Preservation in Transit-Oriented Districts*, a study on the need, priorities and tools in protecting assisted and unassisted housing in the City of Los Angeles. The study found that preserving affordable housing near transit is important because:

- Economic competitiveness relies on offering housing for workers of all incomes
- Low- and moderate-income workers support a successful transit system
- An opportunity exists today that might not exist tomorrow
- The City's affordable housing stock is at risk

In understanding the importance of preserving affordable housing options in TODs, this report proposes that housing preservation be included in a comprehensive TOD strategy that might include the following, for example:

- Affordable housing preservation;
- Coordinated land use regulations that leverage new transit-oriented development (both market rate and affordable);
- Provision of other amenities such as parks, quality schools, fresh food, etc.;
- Making last mile connections and investing in supportive pedestrian, bicycle, parking improvements and land use planning efforts; and
- Coordinated workforce and economic development strategy that considers both business attraction and job training near transit.

Urban Displacement Project

According to the Urban Displacement Project, a research collaboration between UC Berkeley and UCLA, Downtown Los Angeles has experienced the greatest number of Census tracts with gentrification between 1990 and 2013.³¹ The study's key findings for Los Angeles County are as follows:

- Areas around transit stations are changing and that many of the changes are in the direction of neighborhood upscaling and gentrification;
- From 2000 2013, relative to non-transit areas, transit neighborhoods are more associated with higher increases in whites, college educated, higher-income households and greater increases in the cost of rent. Conversely, transit neighborhoods are

³¹ See online interactive map at http://www.urbandisplacement.org/map/la#.

- associated with greater losses in disadvantaged populations including individuals with less than a high school diploma and lower-income households;
- The impacts of changes vary across locations but the biggest impacts seem to be around the Downtown (Los Angeles) areas where transit-oriented development interacts with other interventions aiming to revitalize the urban form.³²

This kind of population displacement, or gentrification, can be linked to segregation in various neighborhoods around the region. Notably, transit-oriented developments and neighborhoods seem to attract white, more highly educated, and higher-income groups than do other neighborhoods, causing greater segregation.

Displacement Patterns

In April 2017, the California Housing Partnership and the Corporation for Supportive Housing completed a report on affordable housing in LA County, and found that the County needs to add more than 550,000 affordable homes to meet current demand among renter households at or below 50 percent of area median income.³³ The report mapped countywide patterns of transit access, displacement risk, and the ratio of low-wage jobs to affordable homes (a metric referred to as having a good "fit"), and found that gentrification occurred almost entirely in urban areas well-served by transit.³⁴ Gentrification will place an inordinate displacement pressure on low-income households, especially for those living in the areas well served by transit.

The report warns that, especially near Downtown Los Angeles, there are many affordable housing properties well-served by transit that are at high risk of being converted to market rate properties in the next five years.³⁵ Preservation efforts, thus, should be focused in areas like this to ensure that low-income residents are well positioned to remain and not be displaced from their homes.

Summary

In a troubling report, crimes do appear to be on the rise on Los Angeles County, which may lead those with means to move out of crime-ridden areas, thus only further exacerbating the social ills brought on by segregation. TOD should be pursued by planners and developers in a way that ensures equity among all racial and ethnic groups, not just for young, non-Hispanic White and Asian residents. Affordable housing near transit should be preserved and pursued in order to curb gentrification, a driving force behind segregation.

³² See Urban Displacement's homepage at http://www.urbandisplacement.org/map/la

³³ http://1p08d91kd0c03rlxhmhtydpr.wpengine.netdna-cdn.com/wp-content/uploads/2017/05/FinalOutcomesReport.pdf.

³⁴ Ibid.

³⁵ Ibid.

C. RACIALLY/ETHNICALLY CONCENTRATED AREAS OF POVERTY

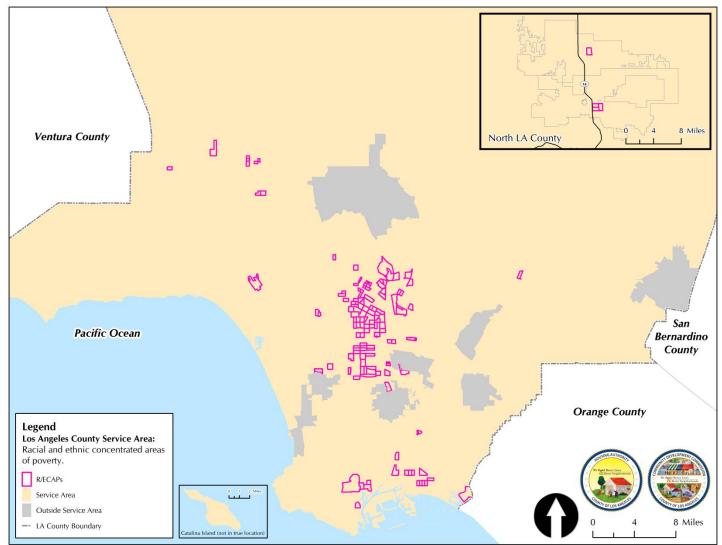
Racially or ethnically concentrated areas of poverty (R/ECAPs) are Census tracts with relatively high concentrations of non-white residents with these residents living in poverty. Formally, an area is designated an R/ECAP if two conditions are satisfied: first, the non-white population, whether Hispanic or non-Hispanic, must account for at least 50 percent of the Census tract population. Second, the poverty rate in that Census must exceed a certain threshold. That threshold is set at either 40 percent or three times the overall poverty rate, whichever is lower.

R/ECAP GROUPINGS

The largest groupings of R/ECAP Census tracts can be found in downtown Los Angeles and, to a lesser extent, to the south in Long Beach. There are a few tracts designated as R/ECAP near San Fernando and to the north, in the Lancaster/Palmdale area. In the Housing Authority service area, these groupings are identical (albeit in a slightly smaller service area, as the cities of Hawaiian Gardens, Torrance, and Culver City are excluded). In the CDC service area, the R/ECAPs are located in the central portion of the County, mostly around the City of Los Angeles. The Sawtelle VA Center R/ECAP represents the largest (in land area) of this latter group.

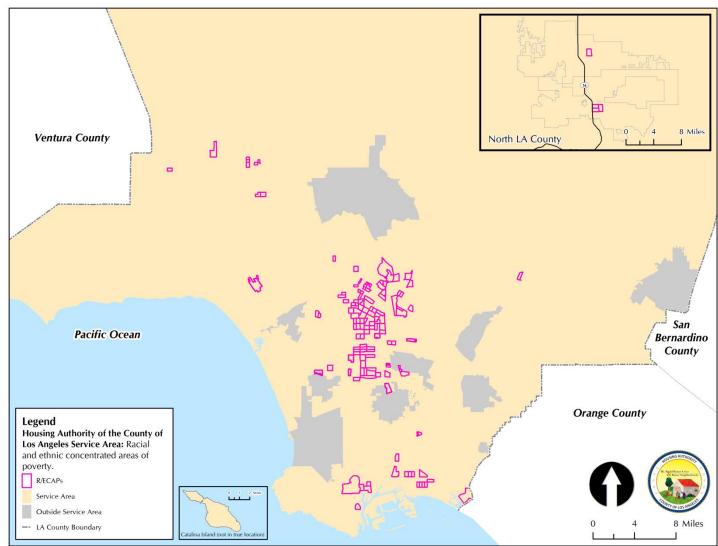
See Map IV.39 below for groupings of R/ECAPs in the service area, Map IV.40 on page 127 for R/ECAPs in the HACoLA service area alone, and Map IV.41 on page 128 for R/ECAPs in the Urban County alone.

Map IV.39
Current R/ECAP Census Tracts
Los Angeles County Service Area
HUD Database

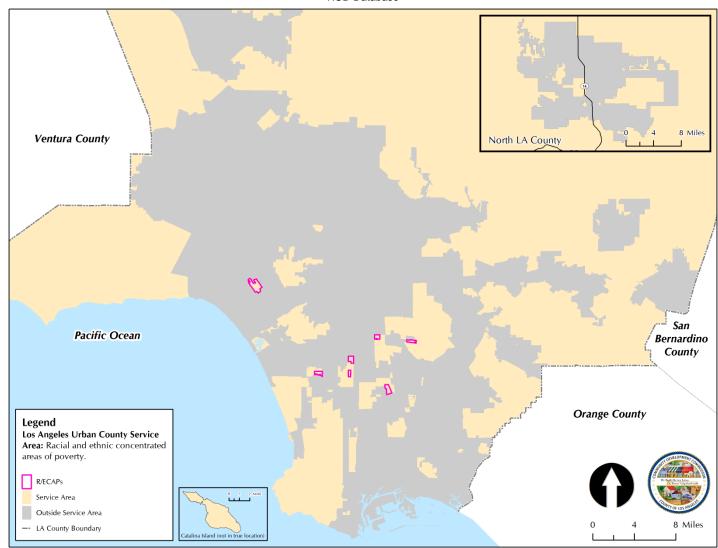


Map IV.40 Current R/ECAP Census Tracts HACoLA Service Area

HUD Database



Map IV.41
Current R/ECAP Census Tracts
Los Angeles Urban County
HUD Database



PROTECTED CLASSES IN R/ECAPS

Service Area

In the Los Angeles County Service Area, there is a disproportionate share of Hispanic residents living in R/ECAP areas, with nearly 72 percent of the service area R/ECAP population being Hispanic (as shown below in Table IV.17). This number represents a gross over-representation of that ethnic group, as Hispanics only accounted for 47.4 percent of the service area population in 2015 (as shown in Map IV.21 on page 101). The Black population is also over-represented among the R/ECAP population, but not to the degree of the Hispanics: nearly 15 percent of the R/ECAP population was black, as compared to 8.3 percent of the service area population shown in Table IV.6 on page 74. Conversely, White residents comprise only 5 percent of the R/ECAP population, while they totaled nearly 28 percent of the overall service area population in 2010.

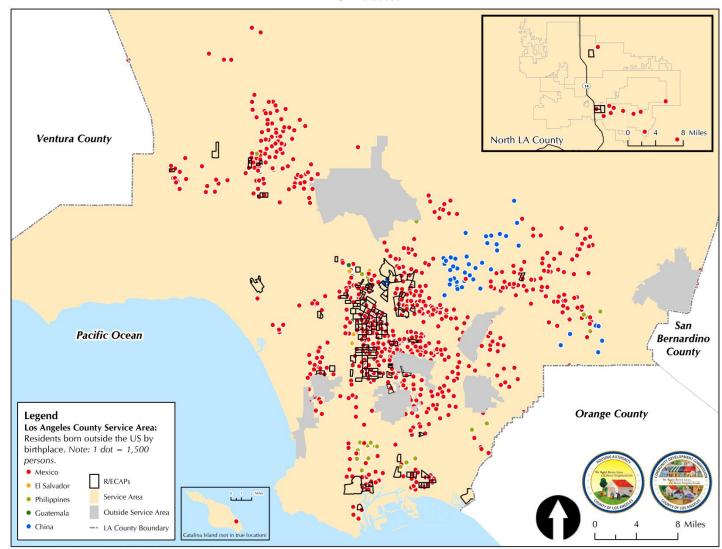
Map IV.42 shows foreign-born residents as dot densities along with R/ECAP Census tracts (see page 130). As shown there, a disproportionate number of Mexican-born residents live in R/ECAPs (just over 24 percent). Not surprisingly, a large number of Spanish-speaking residents also live in R/ECAPs, as shown in Map IV.43 on page 131. These areas of high concentration occur mainly in Downtown Los Angeles, as well as to the south and east of this area.

Table IV.17
HUD AFFH Table 4 – R/ECAP Demographics

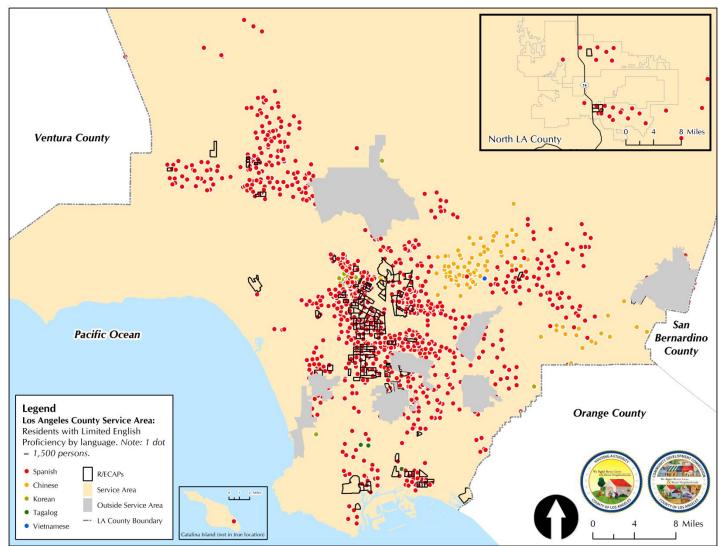
Los Angeles County Service Area 2017 HUD AFFH Database

R/ECAP Race/Ethnicity		Number	Percent
Total Population in R/ECAPs		505,610	-
White, Non-Hispanic		26,121	5.17%
Black, Non-Hispanic		75,173	14.87%
Hispanic		362,678	71.73%
Asian or Pacific Islander, Non-			
Hispanic		34,258	6.78%
Native American, Non-Hispanic		964	0.19%
Other, Non-Hispanic		1,321	0.26%
R/ECAP Family Type			
Total Families in R/ECAPs		95,764	-
Families with children		58,926	61.53%
R/ECAP National Origin	Country		
#1 country of origin	Mexico	122,038	24.14%
#2 country of origin	El Salvador	27,823	5.50%
#3 country of origin	Guatemala	22,181	4.39%
	China excl. Hong Kong &		
#4 country of origin	Taiwan	6,145	1.22%
#5 country of origin	Honduras	5,116	1.01%
#6 country of origin	Korea	4,821	0.95%
#7 country of origin	Philippines	3,244	0.64%
#8 country of origin	Cambodia	2,921	0.58%
#9 country of origin	Belize	2,174	0.43%
#10 country of origin	Nicaragua	1,824	0.36%

Map IV.42 Foreign-Born Residents with R/ECAPs
Los Angeles County Service Area
HUD Database



Map IV.43 Limited English Proficiency with R/ECAPs
Los Angeles County Service Area
HUD Database



Region

For the Los Angeles-Long Beach-Anaheim Region of Orange and Los Angeles Counties, there is a disproportionate amount of Hispanic and, to a much lesser extent, Black residents in the R/ECAPs within the region. According to HUD-generated tables for the region, Hispanics comprise over 70 percent of the population living in R/ECAPs, while Blacks comprise nearly 14 percent (see Table IV.18 below). This indicates a disproportionate share, as Hispanics only total 44 percent of the entire regional population and Blacks total 6.7 percent (see Map IV.36 on page 117 for regional Hispanic population dot density and Map IV.35 on page 116 for regional Black population dot density). There does not appear to be a large segment of Asian residents living in R/ECAP areas, as evidenced by Map IV.34 on page 115.

Mexican-born residents living in R/ECAPs comprise nearly 1 in 4 residents living in R/ECAPs, while this group only represents 14.3 percent of the regional population, a difference of more than 10 percentage points (see Map IV.44 below for foreign-born residents with R/ECAPs). El Salvadorians, similarly, represent a disproportionate share of the regional R/ECAP population, with over 5 percent of the R/ECAP population in the region but only 2.3 percent of the overall regional population.

Spanish-speaking residents with limited English proficiency represent a disproportionate share of the regional R/ECAP population at over 33.5 percent of that group's population, while only comprising just under 17 percent of the overall regional population. See Map IV.45 on page 135 for a dot density map of LEP residents with R/ECAPs.

Table IV.18
HUD AFFH Table 4 – R/ECAP Demographics

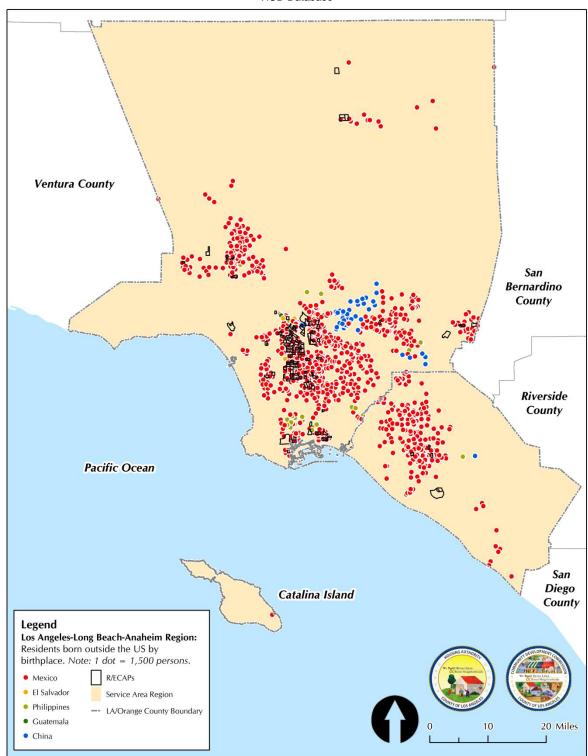
Los Angeles-Long Beach-Anaheim Region 2017 HUD AFFH Database

R/ECAP Race/Ethnicity		Number	Percent
Total Population in R/ECAPs		562,051	-
White, Non-Hispanic		34,911	6.21%
Black, Non-Hispanic		77,656	13.82%
Hispanic		395,944	70.45%
Asian or Pacific Islander, Non-			
Hispanic		44,800	7.97%
Native American, Non-Hispanic		1,043	0.19%
Other, Non-Hispanic		1,455	0.26%
R/ECAP Family Type			
Total Families in R/ECAPs		104,826	-
Families with children		64,580	61.61%
R/ECAP National Origin	Country		
#1 country of origin	Mexico	138,110	24.57%
#2 country of origin	El Salvador	29,075	5.17%
#3 country of origin	Guatemala	22,964	4.09%
	China excl. Hong Kong &		
#4 country of origin	Taiwan	6,958	1.24%
#5 country of origin	Korea	5,496	0.98%
#6 country of origin	Honduras	5,221	0.93%
#7 country of origin	Philippines	3,592	0.64%
#8 country of origin	Cambodia	3,378	0.60%
#9 country of origin	Vietnam	2,828	0.50%
#10 country of origin	Belize	2,199	0.39%

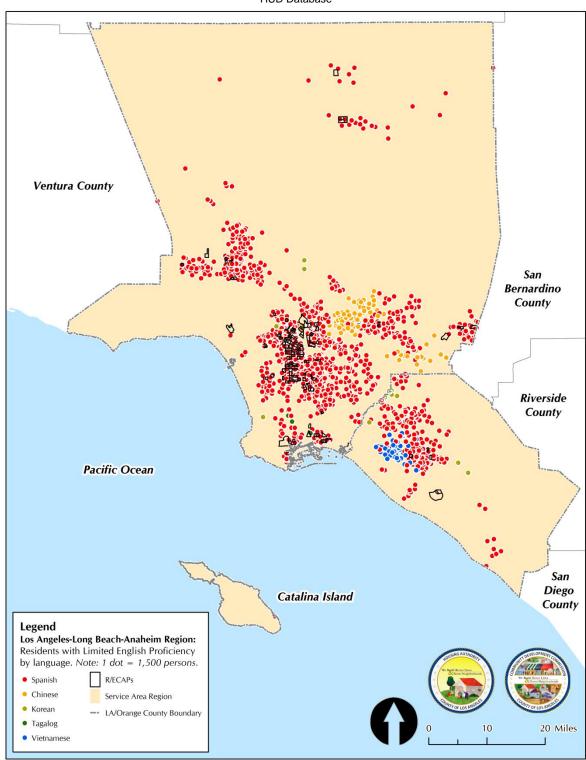
The following maps show the geographic dispersion of select racial minorities, foreign-born residents, and LEP residents in the Los Angeles-Long Beach-Anaheim Region by way of dot

densities, along with pink polygons designating Racial and Ethnic Concentrations of Poverty. The dots represent multiples of 2,500 persons in a given Census tract, not the geocoded locations of specific minority groups.

Map IV.44
Foreign-Born Residents with R/ECAPs
Los Angeles-Long Beach-Anaheim Region
HUD Database



Map IV.45
Limited English Proficiency with R/ECAPs
Los Angeles-Long Beach-Anaheim Region
HUD Database

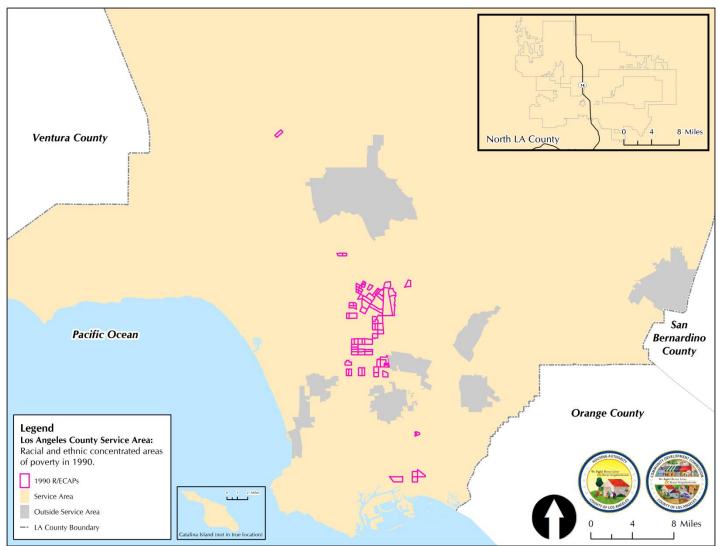


R/ECAP TRENDS (SINCE 1990)

In 1990, there were 77 R/ECAPs, most of them around Downtown Los Angeles, with a few in Long Beach (see Map IV.46 below). By 2000, there were 150 scattered throughout the service area, largely in the same general areas although in greater numbers in Long Beach and to the north near San Fernando (see Map IV.47 on page 138). Map IV.49 on page 140 shows the 1990 race/ethnicity of the service area with the 1990 R/ECAPs, and as can be seen there, Hispanics again dominate the areas with high R/ECAP concentration. Black residents can also be found in R/ECAPs in the 1990 map, but in smaller numbers than the Hispanic population. Similarly for 2000 (see Map IV.50 on page 141), Hispanics are the most prevalent racial/ethnic group clustered around R/ECAPs, largely near Downtown Los Angeles and to the south. There is a large cluster of Black residents living in and around a few R/ECAPs southwest of Los Angeles, in the cities of Westmont and Ladera Heights.

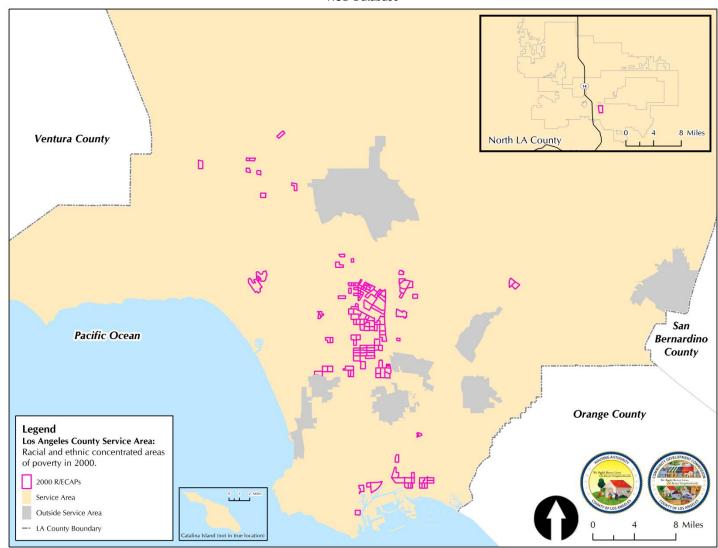
Map IV.46 1990 R/ECAPs

Los Angeles County Service Area HUD Database



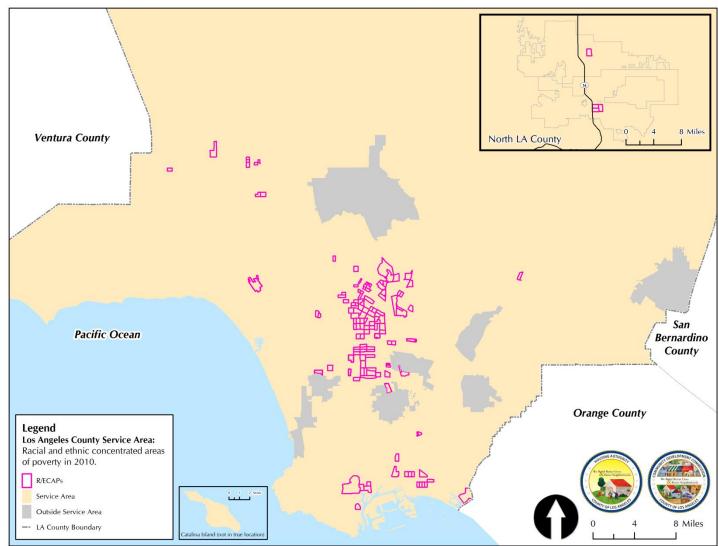
Map IV.47 2000 R/ECAPs

Los Angeles County Service Area HUD Database

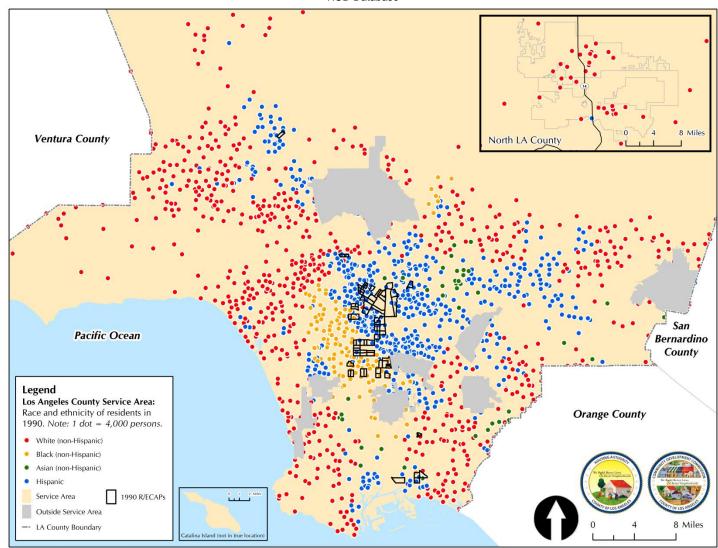


Map IV.48 2010 R/ECAPs

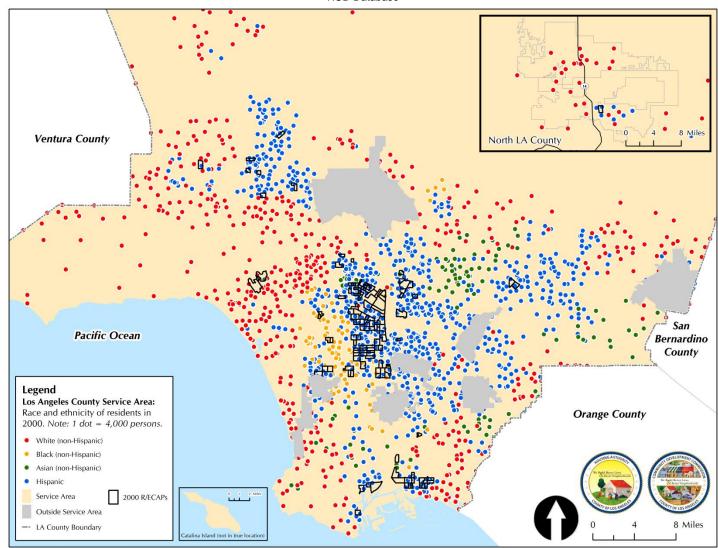
Los Angeles County Service Area HUD Database



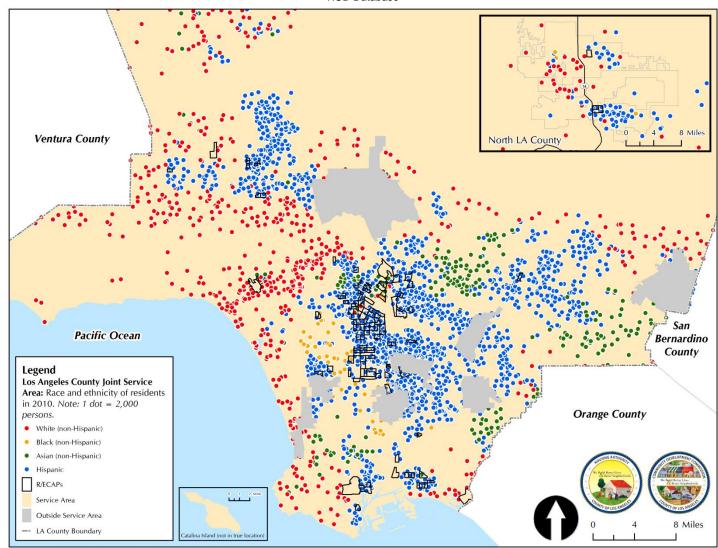
Map IV.49
1990 Race/Ethnicity with 1990 R/ECAPs
Los Angeles County Service Area
HUD Database



Map IV.50 2000 Race/Ethnicity with 2000 R/ECAPs Los Angeles County Service Area HUD Database



Map IV.51 2010 Race/Ethnicity with 2010 R/ECAPs Los Angeles County Service Area HUD Database



ADDITIONAL INFORMATION

Income & Poverty

For the Los Angeles-Long Beach-Anaheim Region, there appeared to be an upward shift in the household incomes of residents from 2000 through 2010-2015, as measured in nominal dollars.³⁶ However, this shift only occurred in the highest income brackets as a percent share of the overall household number, while percentages of middle- and low-income households fell during that time period. As shown below in Table IV.19, the share of households with incomes of \$100,000 per year or more grew by 12.3 percentage points, and the number of those with incomes from \$75,000 up to \$100,000 grew by a single percentage point.

Table IV.19
Households by Income

Los Angeles-Long Beach-Anaheim Region 2000 Census SF3 & 2015 Five-Year ACS Data

Income	2000 Census		2015 Five-	Year ACS
income	Households	% of Total	Households	% of Total
Less than \$15,000	615,395	15.1%	483,700	11.3%
\$15,000 to \$19,999	234,525	5.8%	208,689	4.9%
\$20,000 to \$24,999	244,974	6.0%	209,945	4.9%
\$25,000 to \$34,999	473,418	11.6%	386,345	9.0%
\$35,000 to \$49,999	609,529	15.0%	516,128	12.1%
\$50,000 to \$74,999	751,929	18.5%	703,118	16.5%
\$75,000 to \$99,999	449,154	11.0%	510,573	12.0%
\$100,000 or More	693,509	17.0%	1,253,924	29.3%
Total	4,072,433	100.0%	4,272,422	100.0%

In spite of the fact that a larger percentage of households were earning \$75,000 or more in 2015 than were in 2000, the poverty rate rose from 16.2 to 16.9 percent over that same time period. For a breakdown of poverty by age, see Table IV.20 below.

Table IV.20 Poverty by Age

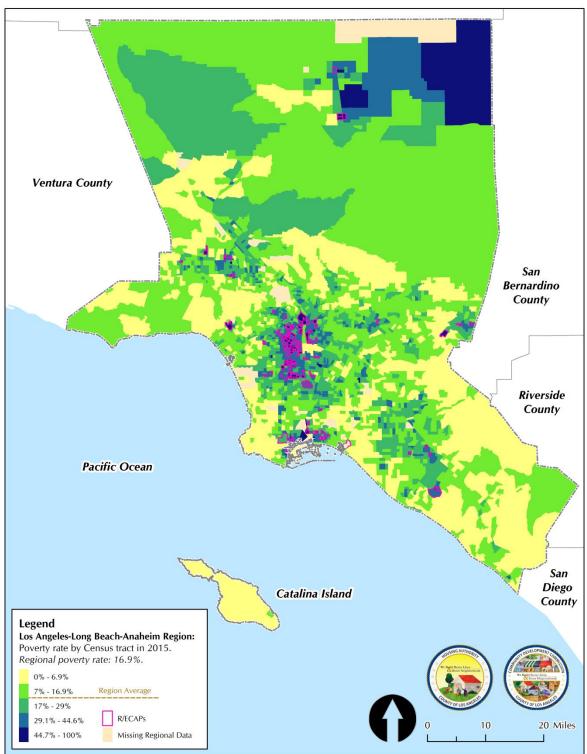
Los Angeles-Long Beach-Anaheim Region 2000 Census SF3 & 2015 Five-Year ACS Data

Ago	2000 Censu	ıs	2015 Five-Year	ACS
Age	Persons in Poverty	% of Total	Persons in Poverty	% of Total
Under 6	257,186	13.1%	242,563	11.0%
6 to 17	484,961	24.7%	474,176	21.6%
18 to 64	1,111,623	56.6%	1,288,600	58.7%
65 or Older	110,304	5.6%	190,409	8.7%
Total	1,964,074	100.0%	2,195,748	100.0%
Poverty Rate	16.2%	-	16.9%	•

Regionally, poverty is generally concentrated in four clusters: near San Fernando, close to downtown Los Angeles, in and around Long Beach, and in Orange County near the cities of Santa Ana and Irvine (see Map IV.52 below for regional poverty rates with R/ECAP Census tracts).

³⁶ Nominal dollars, unlike real dollars, have not been adjusted for inflation.

Map IV.52 Regional Poverty Rates by Census Tract
Los Angeles County Region
2015 Five-Year ACS



Data Sources: 2015 Five-Year ACS, County of Los Angeles, Census Tigerline, Esri

Thus far, we have seen concentrations of poverty as well as concentrations of racial and ethnic minorities. These two concerns tend to be highly correlated. Racially or ethnically concentrated areas of poverty (R/ECAPs) are Census tracts with relatively high concentrations of non-white residents with these residents living in poverty. As explained on page 125, an area is designated an R/ECAP if two conditions are satisfied: first, the non-white population, whether Hispanic or non-Hispanic, must account for at least 50 percent of the Census tract population. Second, the poverty rate in that Census must exceed a certain threshold. That threshold is set at either 40 percent or three times the overall poverty rate, whichever is lower.

Within Los Angeles County, immigrant and non-English speaking parent households had the highest rates of poverty. Immigrant parent(s) households had a poverty rate of 45.8 percent, according to the study, and households with parent(s) not English proficient had poverty rates of 47.3 percent in Los Angeles County. Some 51 percent of poor child households in Los Angeles County had at least one parent employed full-time, and only 6 percent were unemployed. In addition, an estimated 41 percent of these households had parents with less than a high school diploma.

Housing problems were significantly more common in poor child households, with 67 percent of poor households versus 40 percent of non-poor households facing over-crowding. Some 33 percent of poor households were housing burdened, compared to 4 percent of non-poor households.

Resident Fair Housing Survey in R/ECAPs

Select results from the 2017 Resident Fair Housing Survey are shown below by R/ECAP neighborhood. Further breakdowns of this data into public housing residents, Section 8 residents, HACoLA service area, and Urban County service area can be found later in this document. For a full report of survey results, see Technical Appendix Volume II.

Forty-three respondents from Athens/Westmont answered the survey, and regarding perceptions of safety, sixteen felt unsafe when walking the neighborhood at night (see Table IV.21 below). Half of these felt unsafe when walking in the neighborhood during the day (approximately 19 percent). Only four respondents felt safe walking through the neighborhood during the day.

Table IV.21 Perceptions of Safety Athens/Westmont Fair Housing Survey

Response	Not safe	Somewhat Safe	Safe	Very Safe	Does Not Apply	Missing	Total
How safe would you say you fell walking in your neighborhood during the day time?	8	15	15	4		1	43
How safe would you say you feel walking in your neighborhood at night?	16	20	6	0		1	43
How safe would you say you feel walking in your public housing development during the day time?	4	4	4	3	21	7	43
How safe would you say you feel walking in your public housing development at night?	5	3	5	1	22	7	43

Regarding displacement, most residents (whether renting or owning their home) had not been displaced within the last ten years.

Table IV.22
Have you been displaced from your housing within the last 10 years?

Athens/Westmont Fair Housing Survey

Displaced	Responses
Yes, as a renter	4
No, as a renter	19
Yes, as an owner	0
No, as an owner	14
Don't remember	2
Missing	4
Total	43

Regarding discrimination, only two respondents felt they had been discriminated against because of race/ethnicity, with another two having been discriminated against on the grounds of income (see Table IV.23 below).

Table IV.23

Do you believe that you have been discriminated against in your housing because of any of the following (Check all that apply):

Athens/Westmont Fair Housing Survey

Category	Responses
Race/ethnicity	2
Religion	0
Disability	1
Sexual Orientation	0
Pregnant or having children	0
Sex/Gender	1
Age	1
Marital Status	0
National Origin	1
Ancestry	0
Familial Status	0
Criminal History/Record	0
Source of income	2

In Athens/Westmont, only two respondents indicated having filed a fair housing complaint, and of these, only one of the two was satisfied with the outcome. The majority of respondents in Athens/Westmont answered 'Does Not Apply' to this question.

Table IV.24
Fair Housing Complaints

Athens/Westmont Fair Housing Survey

Complaints	Yes	No	Don't Know	Does Not Apply	Missing	Total
If you have ever been discriminated by your landlord, did you complain?	2	7	2	23	9	43
Were you satisfied with the outcome?	1	3	0	25	14	43

Nine respondents from Bell answered the survey, and regarding perceptions of safety, only one felt unsafe when walking the neighborhood at night (see Table IV.25 below). Another respondent felt unsafe when walking in the neighborhood during the day, while five respondents felt safe walking through the neighborhood during the day.

Table IV.25
Perceptions of Safety
Bell

Fair Housing Survey

Response	Not safe	Somewhat Safe	Safe	Very Safe	Does Not Apply	Missing	Total
How safe would you say you fell walking in your neighborhood during the day time?	1	2	5	1		0	9
How safe would you say you feel walking in your neighborhood at night?	1	4	3	0		1	9
How safe would you say you feel walking in your public housing development during the day time?	0	2	3	1	3.	0	9
How safe would you say you feel walking in your public housing development at night?	0	2	4	0	3.	0	9

Regarding displacement, most residents (whether renting or owning their home) had not been displaced within the last ten years.

Table IV.26
Have you been displaced from your housing within the last 10 years?

Bell

Fair Housing Survey

	<u> </u>
Displaced	Responses
Yes, as a renter	1
No, as a renter	6
Yes, as an owner	0
No, as an owner	1
Don't remember	0
Missing	1
Total	9

No respondents felt they had been discriminated against in Bell (see Table IV.27 below).

Table IV.27

Do you believe that you have been discriminated against in your housing because of any of the following (Check all that apply):

Bell Fair Housing Survey

Category	Responses
Race/ethnicity	0
Religion	0
Disability	0
Sexual Orientation	0
Pregnant or having children	0
Sex/Gender	0
Age	0
Marital Status	0
National Origin	0
Ancestry	0
Familial Status	0
Criminal History/Record	0
Source of income	0

No residents from Bell had filed a fair housing complaint, with six of the nine answering 'Does Not Apply' to the question.

Table IV.28
Fair Housing Complaints
Bell

Fair Housing Survey

Complaints	Yes	No	Don't Know	Does Not Apply	Missing	Total
If you have ever been discriminated by your landlord, did you complain?	0	3	0	6	0	9
Were you satisfied with the outcome?	0	0	0	4	5	9

Nine respondents from Florence/Firestone answered the survey, and regarding perceptions of safety, only one felt unsafe when walking the neighborhood at night (see Table IV.29 below). Three respondents felt unsafe when walking in the neighborhood during the day, while four felt safe walking through the neighborhood during the day. Three of the nine felt very safe while walking in their respective housing developments during the day.

Table IV.29
Perceptions of Safety

Florence/Firestone Fair Housing Survey

Response	Not safe	Somewhat Safe	Safe	Very Safe	Does Not Apply	Missing	Total
How safe would you say you fell walking in your neighborhood during the day time?	1	2	2	4		0	9
How safe would you say you feel walking in your neighborhood at night?	3	4	1	1		0	9
How safe would you say you feel walking in your public housing development during the day time?	0	0	1	3	3.	2	9
How safe would you say you feel walking in your public housing development at night?	0	1	2	1	3.	2	9

Regarding displacement, most residents (whether renting or owning their home) had not been displaced within the last ten years.

Table IV.30
Have you been displaced from your housing within the last 10 years?

Florence/Firestone Fair Housing Survey

Displaced	Responses
Yes, as a renter	1
No, as a renter	2
Yes, as an owner	0
No, as an owner	4
Don't remember	1
Missing	1
Total	9

No respondents felt they had been discriminated against in Florence/Firestone (see Table IV.31 below).

Table IV.31

Do you believe that you have been discriminated against in your housing because of any of the following (Check all that apply):

Florence/Firestone Fair Housing Survey

Category	Responses
Race/ethnicity	0
Religion	0
Disability	0
Sexual Orientation	0
Pregnant or having children	0
Sex/Gender	0
Age	0
Marital Status	0
National Origin	0
Ancestry	0
Familial Status	0
Criminal History/Record	0
Source of income	0

Of the nine respondents, only one had filed a complaint regarding fair housing, and that respondent was not satisfied with the outcome.

Table IV.32 Fair Housing Complaints

Florence/Firestone Fair Housing Survey

Complaints	Yes	No	Don't Know	Does Not Apply	Missing	Total
If you have ever been discriminated by your landlord, did you complain?	1	0	0	6	2	9
Were you satisfied with the outcome?	0	1	0	5	3	9

Nine respondents from Lennox answered the survey, and regarding perceptions of safety, only one felt unsafe when walking the neighborhood at night (see Table IV.33 below). Three respondents felt unsafe when walking in the neighborhood during the day, while two felt safe

walking through the neighborhood during the day. None of the respondents felt very safe while walking in their respective housing developments during the day.

Table IV.33 Perceptions of Safety

Lennox
Fair Housing Survey

Response	Not safe	Somewhat Safe	Safe	Very Safe	Does Not Apply	Missing	Total
How safe would you say you fell walking in your neighborhood during the day time?	1	3	3	0		2	9
How safe would you say you feel walking in your neighborhood at night?	3	2	2	0		2	9
How safe would you say you feel walking in your public housing development during the day time?	0	3	1	0	1.	4	9
How safe would you say you feel walking in your public housing development at night?	1	2	1	0	1.	4	9

Regarding displacement, most residents (whether renting or owning their home) had not been displaced within the last ten years.

Table IV.34
Have you been displaced from your housing within the last 10 years?

Lennox Fair Housing Survey

Displaced	Responses
Yes, as a renter	0
No, as a renter	2
Yes, as an owner	0
No, as an owner	2
Don't remember	3
Missing	2
Total	9

No respondents felt they had been discriminated against in Lennox (see Table IV.35 below).

Table IV.35

Do you believe that you have been discriminated against in your housing because of any of the following (Check all that apply):

Lennox

Fair Housing Survey Category Responses Race/ethnicity Religion 0 Disability 0 Sexual Orientation 0 Pregnant or having children Sex/Gender 0 Age Marital Status 0 National Origin Ancestry 0 Familial Status 0 Criminal History/Record 1 0 Source of income

Of the nine respondents, only one had filed a complaint regarding fair housing, and that respondent was not satisfied with the outcome.

Table IV.36 Fair Housing Complaints

Lennox Fair Housing Survey

Complaints	Yes	No	Don't Know	Does Not Apply	Missing	Total
If you have ever been discriminated by your landlord, did you complain?	1	3	0	2	3	9
Were you satisfied with the outcome?	0	2	1	2	4	9

Only one respondent from Sawtelle VA Center answered the survey, and regarding perceptions of safety, the respondent felt very safe when walking the neighborhood either at night or during the day (see Table IV.37 below).

Table IV.37 Perceptions of Safety

Sawtelle VA Center Fair Housing Survey

Response	Not safe	Somewhat Safe	Safe	Very Safe	Does Not Apply	Missing	Total
How safe would you say you fell walking in your neighborhood during the day time?	0	0	0	1		0	1
How safe would you say you feel walking in your neighborhood at night?	0	0	0	1		0	1
How safe would you say you feel walking in your public housing development during the day time?	0	0	0	0	1.	0	1
How safe would you say you feel walking in your public housing development at night?	0	0	0	0	1.	0	1

The one respondent from Sawtelle VA Center, apparently a home owner, had not been displaced from his/her home in the past 10 years.

Table IV.38
Have you been displaced from your housing within the last 10 years?

Sawtelle VA Center Fair Housing Survey

Displaced	Responses
Yes, as a renter	0
No, as a renter	0
Yes, as an owner	0
No, as an owner	1
Don't remember	0
Missing	0
Total	1

The respondent did not feel that he/she had been discriminated against in choice of housing (see Table IV.39 below).

Table IV.39 Do you believe that you have been discriminated against in your housing because of any of the following (Check all that apply):

Sawtelle VA Center Fair Housing Survey

r air riodsing ourvey					
Category	Responses				
Race/ethnicity	0				
Religion	0				
Disability	0				
Sexual Orientation	0				
Pregnant or having children	0				
Sex/Gender	0				
Age	0				
Marital Status	0				
National Origin	0				
Ancestry	0				
Familial Status	0				
Criminal History/Record	0				
Source of income	0				

The resident from Sawtelle VA Center had not filed a fair housing complaint before.

Table IV.40 Fair Housing Complaints

Sawtelle VA Center Fair Housing Survey

Complaints	Yes	No	Don't Know	Does Not Apply	Missing	Total
If you have ever been discriminated by your landlord, did you complain?	0	0	0	1	0	1
Were you satisfied with the outcome?	0	0	0	1	0	1

The final R/ECAP neighborhood, Willowbrook, had only three respondents fill out the survey. Regarding perceptions of safety, two of the respondents felt unsafe walking around the neighborhood at night, while one felt very safe in their public housing development during the day.

Table IV.41
Perceptions of Safety
Willowbrook

Fair Housing Survey

Response	Not safe	Somewhat Safe	Safe	Very Safe	Does Not Apply	Missing	Total
How safe would you say you fell walking in your neighborhood during the day time?	0	1	1	0		1	3
How safe would you say you feel walking in your neighborhood at night?	2	1	0	0		0	3
How safe would you say you feel walking in your public housing development during the day time?	0	1	0	1	1.	0	3
How safe would you say you feel walking in your public housing development at night?	1	1	0	0	1.	0	3

One renter had been displaced from their housing within the last 10 years, as shown below in Table IV.42 below. One respondent didn't answer and the other respondent answered in the negative.

Table IV.42
Have you been displaced from your housing within the last 10 years?

Willowbrook Fair Housing Survey

	3 - · · ·)
Displaced	Responses
Yes, as a renter	1
No, as a renter	0
Yes, as an owner	0
No, as an owner	1
Don't remember	0
Missing	1
Total	3

None of the Willowbrook respondents felt they had been discriminated against in choice of housing.

Table IV.43

Do you believe that you have been discriminated against in your housing because of any of the following (Check all that apply):

Willowbrook Fair Housing Survey

Category	Responses
Race/ethnicity	0
Religion	0
Disability	0
Sexual Orientation	0
Pregnant or having children	0
Sex/Gender	0
Age	0
Marital Status	0
National Origin	0
Ancestry	0
Familial Status	0
Criminal History/Record	0
Source of income	0

Finally, regarding fair housing complaints, none of the respondents had filed a fair housing complaint on the grounds of discrimination. One respondent, however, indicated they didn't know whether they complained or not.

Table IV.44 Fair Housing Complaints

Willowbrook Fair Housing Survey

Complaints	Yes	No	Don't Know	Does Not Apply	Missing	Total
If you have ever been discriminated by your landlord, did you complain?	0	0	1	1	1	3
Were you satisfied with the outcome?	0	0	0	2	1	3

Housing Authority Developments in R/ECAP Neighborhoods

The following table shows public housing developments (as identified by the Housing Authority of the County of Los Angeles) which are located in R/ECAPs.

Table IV.45 Public Housing Developments in R/ECAP Neighborhoods

Housing Authority of the County of Los Angeles		
Public Housing Development	R/ECAP Neighborhood	
111 th & Firmona	Lennox	
El Segundo I	Willowbrook	
El Segundo II		
1229-35 E. 61 st	Florence/Firestone	
1027-33 W 90 th		
1101-09 W 91 st		
1115-16 W 90 th		
West 94 th St.	Athens/Westmont	
1320 W 107 th		
Athens III		
Imperial Heights		
West 106 th St.		
Woodcrest I		
Woodcrest II		

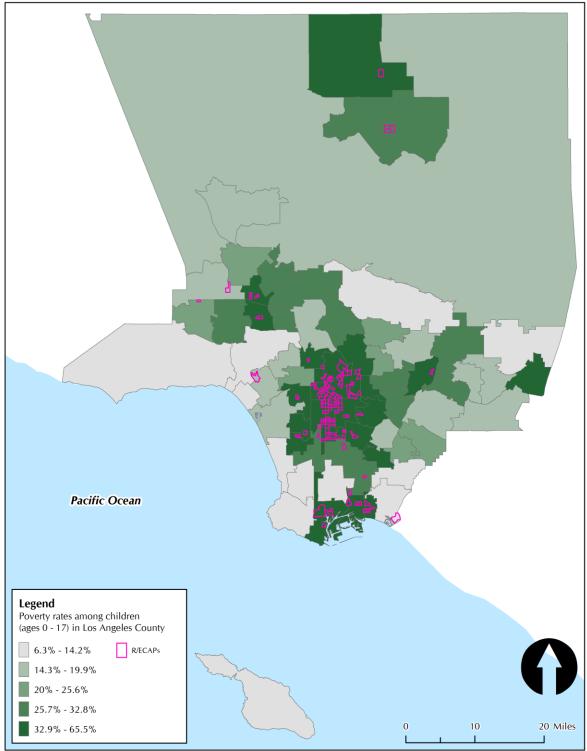
CONTRIBUTING FACTORS OF R/ECAPS

Child Poverty

Regionally, the presence of child poverty rates is highest in R/ECAP areas. According to the Public Policy Institute of California, Los Angeles County has a higher incidence of childhood poverty than the state average, at close to 30 percent. With this in mind, there is a large range of poverty within the County, as some areas had the lowest rates of young childhood poverty found in the state at only 4 percent (this area includes Redondo Beach, Manhattan Beach, and Hermosa Beach). Conversely, child poverty rates in southeastern Los Angles and eastern Vernon exceeded 68 percent. The accompanying maps illustrate the rate of childhood poverty in Los Angeles County for children ages 0-17 (seen in Map IV.53 below) and young childhood ages 0 – 5 (seen in Map IV.54 below). As seen therein, some of the highest rates of child poverty are in the City of Los Angeles, as well as in the north around Lancaster and the east around Pomona. The second map illustrates the poverty rates for young children, aged 0 to 5. The maps see similar trends in areas of child poverty, but also see a higher rate of young child poverty around the Burbank area.

Map IV.53 Childhood Poverty Rates by PUMA with R/ECAPs

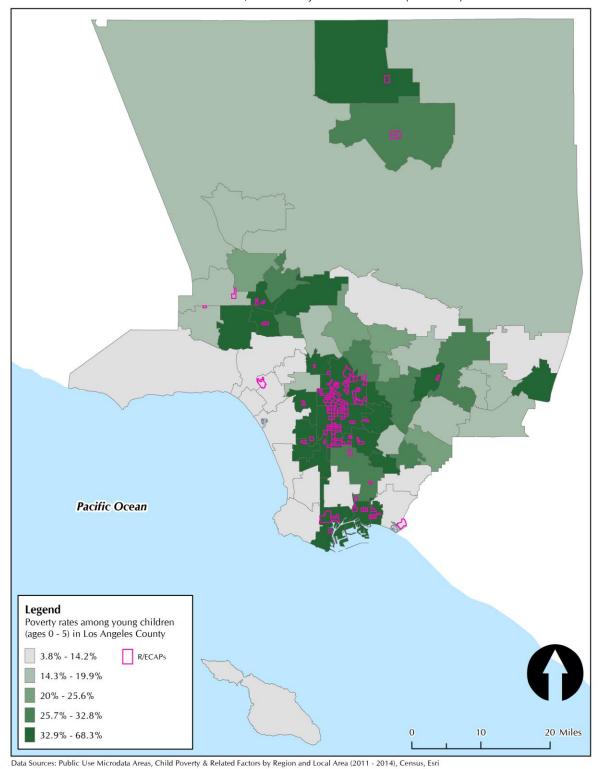
Los Angeles County Public Use Micro Data, Child Poverty & Related Factors (2011-2014)



Data Sources: Public Use Microdata Areas, Child Poverty & Related Factors by Region and Local Area (2011 - 2014), Census, Esri

Map IV.54
Young Childhood Poverty Rates by PUMA with R/ECAPs

Los Angeles County
Public Use Micro Data, Child Poverty & Related Factors (2011-2014)



2017 Assessment of Fair Housing

For the CDC and HACoLA

D. DISPARITIES IN ACCESS TO OPPORTUNITY

HUD identifies five variables that represent areas of opportunity. Areas of opportunity are physical places, areas within communities that provide things one needs to thrive well, including quality employment, good schools, affordable housing, efficient public transportation, safe streets, good services, adequate parks, and full-service grocery stores. Areas lacking opportunity, then, have the opposite of these attributes. The opportunity variables span education, employment, transportation, low poverty, and healthy neighborhoods.

The following discussion will describe in finer detail these five categories of opportunity, and specifically how disparities exist among residents of protected classes to avail themselves of these opportunities. HUD defines seven distinct index indicators, each having a value between 0 and 100, to measure the five opportunities:

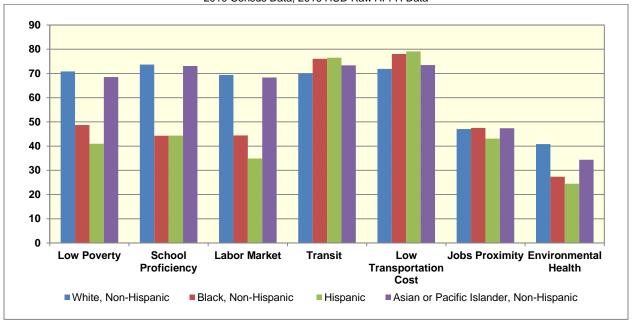
- 1. Access to Educational Opportunity
 - School Proficiency Index
- 2. Access to Employment Opportunity
 - Labor Market Engagement Index
 - Jobs Proximity Index
- 3. Access to Transportation Opportunity
 - Low Transportation Cost Index
 - Transit Trips Index
- 4. Access to Low Poverty Exposure Opportunity
 - Low Poverty Index
- 5. Access to Healthy Neighborhoods Opportunity
 - Environmental Health Index

The following chart shows all Opportunity Index Values by race/ethnicity for the Los Angeles Urban County *only*.³⁷

³⁷ Opportunity index values by race/ethnicity are only available at a jurisdictional level. As such, we are unable to compile these numbers for the entire service area, only for any given jurisdiction in the service area (in this case, the Urban County). The maps in this section show the index values by Census tract, but not by race/ethnicity; only the overall index value is shown.

Diagram IV.2
Opportunity Index Values by Race/Ethnicity for Total Population

Los Angeles Urban County 2010 Census Data, 2016 HUD Raw AFFH Data



EDUCATION

The School Proficiency Index measures the proficiency of elementary schools in the attendance area (where this information is available) of individuals sharing a protected characteristic or the proficiency of elementary schools within 1.5 miles of individuals with a protected characteristic where attendance boundary data are not available. The values for the School Proficiency Index are determined by the performance of 4th grade students on state exams, and the higher the score, the higher the school system quality is in a neighborhood.³⁸

The values for the Los Angeles Urban County are presented by race and ethnicity in Table IV.46, below.

Table IV.46
HUD AFFH Table 12 – Opportunity Indicators by Race/Ethnicity

Los Angeles Urban County 2017 HUD AFFH Database

Race/Ethnicity	School Proficiency Index
White, Non-Hispanic	73.65
Black, Non-Hispanic	44.24
Hispanic	44.35
Asian or Pacific Islander, Non-Hispanic	73.06
Native American, Non-Hispanic	57.33

In the remaining service area, the highest School Proficiency Index values in the service area occurred among White residents in Santa Monica, Asian residents in Santa Monica, White residents in Glendora, and Asian residents in Glendora (values of 80.6, 80.0, 79.7, and 76.2 respectively). The lowest School Proficiency Index values in the service area occurred among

³⁸ AFFH Data Documentation, Version 3.1, July 2016.

Hispanic residents in Palmdale, Black residents in Montebello, Black residents in Inglewood, and Black residents in Palmdale (values of 24.3, 26.5, 26.7, and 27.2 respectively).³⁹

In a recent state-wide study of grade students, it was discovered that Black and Hispanic students scored worse than Asian and White students, showing a growing gap.⁴⁰ The San Marino Unified District, one of the top performing school districts in the state, is located in a high-income area and is comprised of over 50 percent Asian students. L.A. Unified School District (LAUSD), enrolling mostly low-income students, fared much worse overall.⁴¹ However, charter schools in the LAUSD are working to narrow that achievement gap. According to the California Charter Schools Association, charter schools in the City of Los Angeles graduate four times as many students who are college ready than do traditional schools.⁴²

Disparities in Access

As seen by the School Proficiency Index values above, White and Asian residents generally enjoyed greater access to proficient schools, particularly in Santa Monica and Glendora. Conversely, Hispanic and Black residents living in Palmdale, Inglewood, and Montebello lived among schools with the lowest levels of proficiency found anywhere in the service area. The range of values for the opportunity index in the service area was 56.3 value points (that is, the difference between the maximum value and the minimum value among the entitlements), indicating a moderate degree of variation among the race/ethnic groups.

According to the School Proficiency Index maps below, the largest concentration of low scores occur near Downtown Los Angeles (the two largest Census tracts comprising the San Gabriel Mountains also show low scores, but there are no schools here). Conversely, the largest aggregation of high scores can be found to the western and eastern ends of Los Angeles County, as well as to the south around Rancho Palos Verdes. The following maps show this index against Asian, Black, and Hispanic residents, along with dot densities of foreign-born residents. As seen there, Black and Hispanic residents generally live in areas with lower School Proficiency Index values, as well as Mexican-born and (to a lesser extent) Filipino residents.

White residents, conversely, live among areas with some of the highest School Proficiency Index values in the service area, such as the Highway 2 corridor from Hollywood to Santa Monica, much of western LA County, and to the south, near the cities of Palos Verdes Estates and Rolling Hills.

Map IV.59 and Map IV.60 on pages 164 and 165, respectively, show that Mexican-born residents and families with children live in neighborhoods with the lowest school quality, while Chinese-born residents living east of Los Angeles enjoy much higher school quality level.

Finally, the School Proficiency Index is shown for the HACoLA and CDC service areas on Map IV.61 on page 166 and Map IV.62 on page 167, respectively.

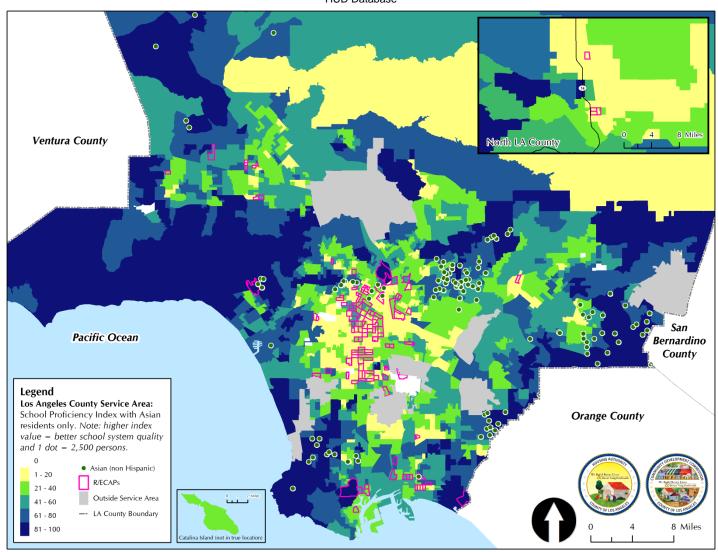
³⁹ This analysis does not take into consideration the seven non-entitlement cities of the service area: Artesia, Bradbury, Hidden Hills, Industry, Palos Verdes Estates, Rolling Hills, and Vernon.

⁴⁰ http://www.latimes.com/local/lanow/la-me-ln-achievement-gaps-widen-20150911-story.html.

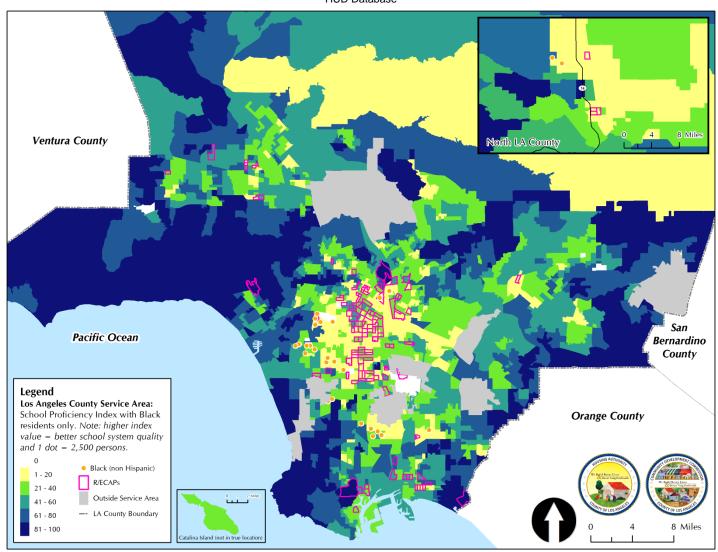
⁴¹ ibid.

⁴² http://www.ccsa.org/blog/2014FactSheet LA College Readiness Report.pdf.

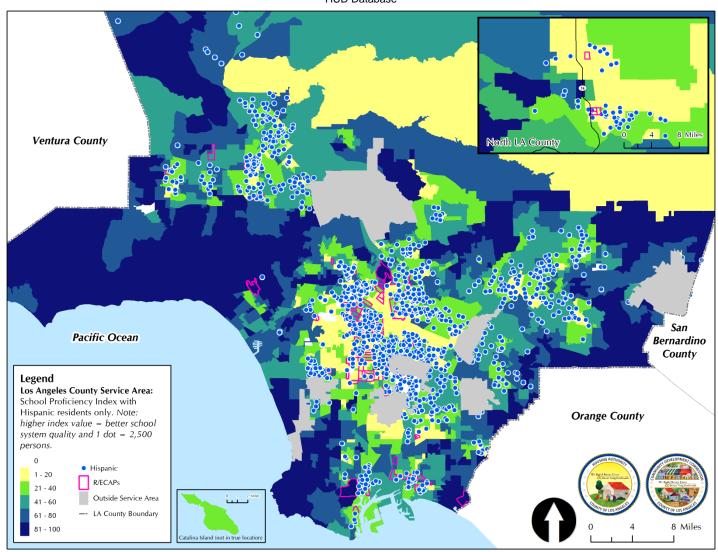
Map IV.55 School Proficiency Index with Asian Residents
Los Angeles County Service Area
HUD Database



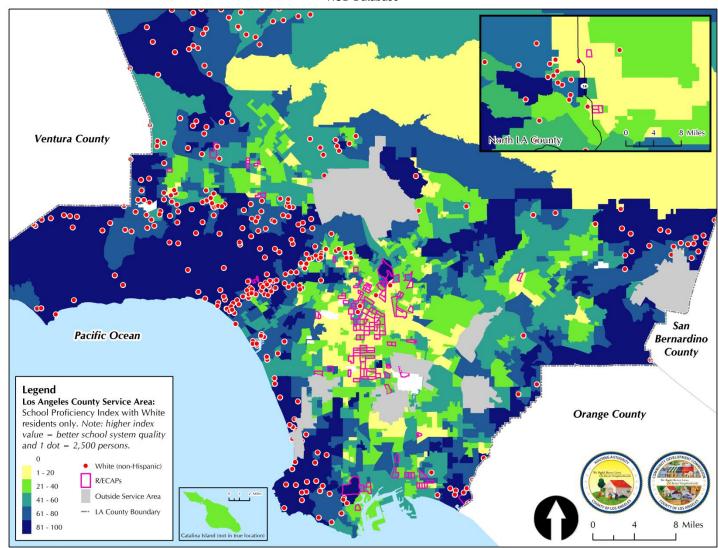
Map IV.56 School Proficiency Index with Black Residents
Los Angeles County Service Area
HUD Database



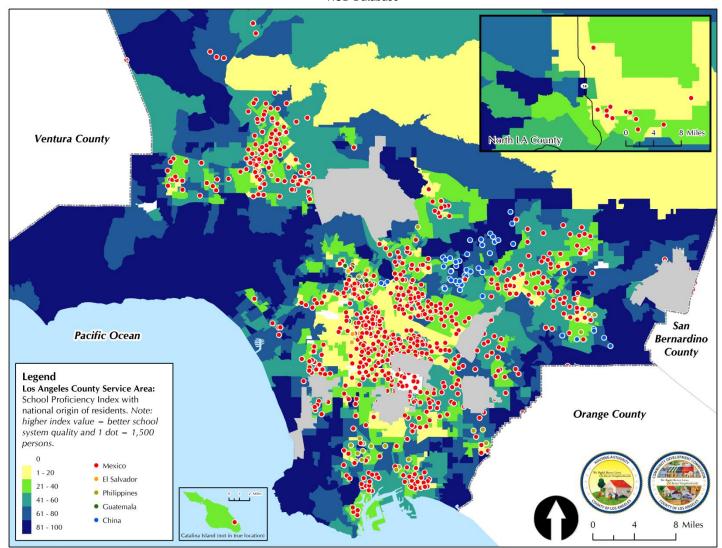
Map IV.57 School Proficiency Index with Hispanic Residents
Los Angeles County Service Area
HUD Database



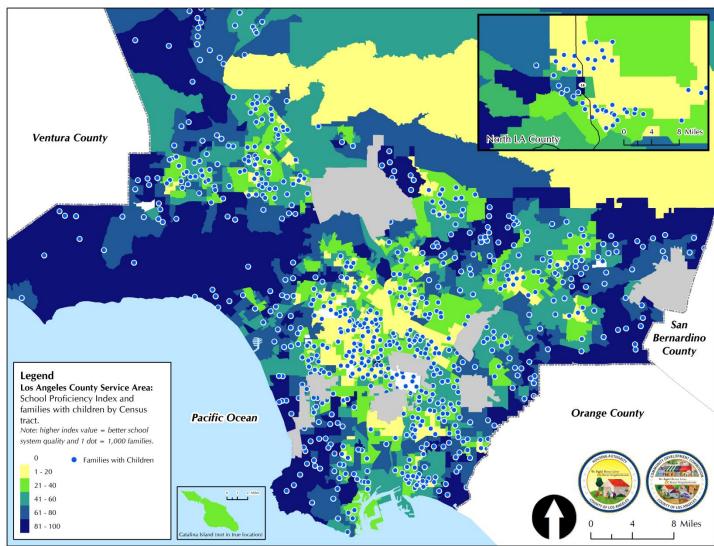
Map IV.58 School Proficiency Index with White Residents
Los Angeles County Service Area
HUD Database



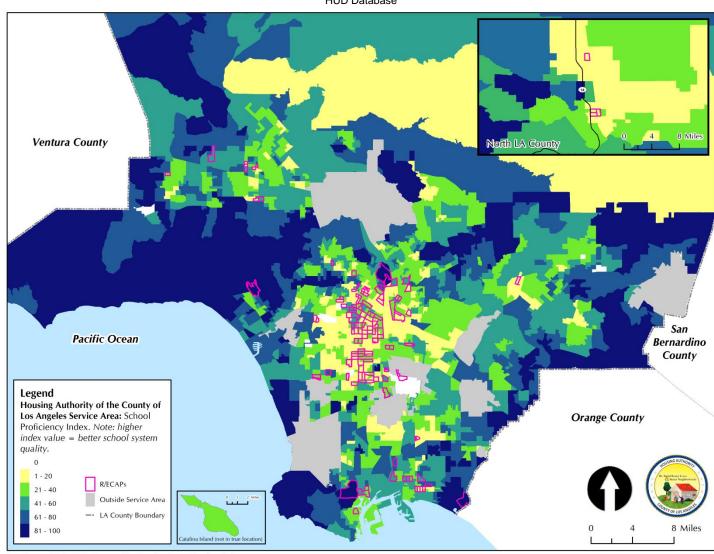
Map IV.59
School Proficiency Index with National Origin
Los Angeles County Service Area
HUD Database



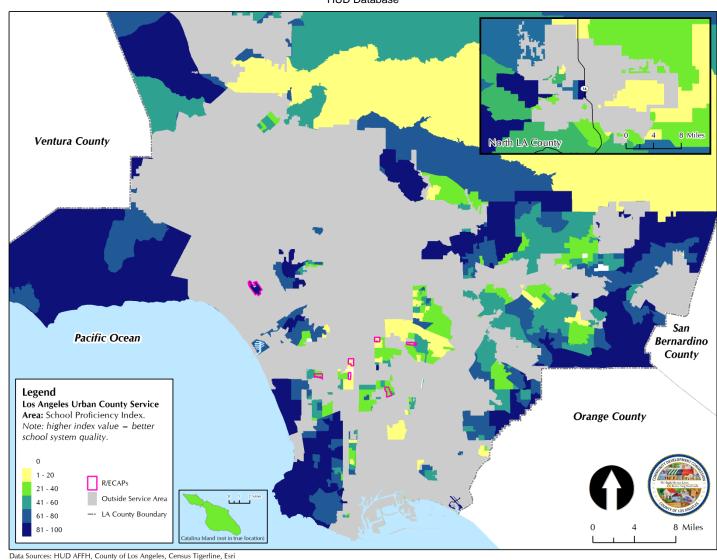
Map IV.60 School Proficiency Index with Family Status
Los Angeles County Service Area
HUD Database



Map IV.61
HACoLA Service Area School Proficiency Index with R/ECAPs
HUD Database



Map IV.62
Urban County School Proficiency Index with R/ECAPs
HUD Database



but sources. From Arri, county of Eds Angeles, census rigenine, Esti

Residency Patterns & Proficient School Proximity

Based on the data and maps presented above, a relationship did appear to exist between As shown in the maps above, the populations with the most exposure to low-scoring areas are Hispanics and native Spanish speakers. Conversely, Chinese-born residents, Asian, and White residents live near more highly-scored areas, leading to greater access to proficient schools.

Relevant School-Related Policies

LA School District Transfer Process

The transfer process within the Los Angeles School district may affect access of protected classes to proficient schools. The Los Angeles Unified School District (LAUSD) offers a variety of ways to transfer schools within the district.⁴³ The following is a list of options for school transfers within the department:

- Small Learning Communities, smaller individualized learning environments within larger school settings
- California Distinguished Schools, an honor that recognizes exemplary educational programs and academic excellence by the California department of education
- Magnet Programs is a court-ordered voluntary integration opportunity available to all students in grades K-12 who live within the boundaries of LAUSD
- Affiliated Charter Schools functions under the auspices of the LAUSD Board of Education
- Public Choice Schools: The Public School Choice Initiative passed by the Los Angeles Board of Education in 2009, offered a new way of opening newly constructed schools and turning around chronically under performing schools.
- Intra District (school to school) Permits:
- Open Enrollment Transfers
- Schools for Advanced Studies
- Open Enrollment Romero

Inter-District Transfers are accepted from February 1 through April 30 annually. Applications are processed in the order they are received, and decisions may be appealed to the District. If individuals of a particular protected class groups are unable to submit an Inter-District Transfer within the appropriate time window, they may not be able to transfer at all.

Education Focus Group Discussion

The three Education Focus Groups were held January 11, February 2, and February 23 at CDTech headquarters, southwest of Downtown Los Angeles. A number of contributing factors were discussed by attendees, including (but not limited to): the location of proficient schools, inadequate funding for schools both public and charter, lack of information on the transfer process for parents, and child safety when walking to school. Individuals attending these focus groups were representative of the organizations outlined in Table IV.47, below.

⁴³ http://achieve.lausd.net/Page/1220

Table IV.47 Educational Opportunities Focus Group Organizations Attending

Organizations Attending			
Meeting #1	Meeting #2	Meeting #3	
Conquest Student Housing	Coalition for Responsible Community Development	Housing Authority of the County of Los Angeles	
Housing Authority of the City of Los Angeles	Housing Authority of the City of Los Angeles	Coalition for Responsible Community Development	
Colchester Creek	Los Angeles County Office of Education	Housing Authority of the City of Los Angeles	
Community Development Commission of County of Los Angeles	Colchester Creek	Colchester Creek	
Angelus Temple	Los Angeles County Department of Public Health	Pico Union Housing	
Elnido Family Centers	Housing Authority of the County of Los Angeles	Los Angeles County Department of Public Health	
Onewest Bank	Los Angeles Housing and Community Development	Los Angeles Housing and Community Development	
Los Angeles County Department of Public Health	Care 1st	Care 1st	
City of Los Angeles	Los Angeles Alliance for a New Economy	All Peoples Community Center	
Youth Policy Institute	Green Dot Public Schools	Los Angeles County Office of Education	
All Peoples Community Center	Pico Union Housing		
Boys & Girls Club			
Advancement Project			
Pico Union Housing			

In the first focus group meeting, one attendee mentioned the difficulty of mixing English-speaking students with non-native English speaking students. This is an undesirable situation, as the children who are trying to learn English have to work twice as hard, while the children who already speak English fluently often lose focus because they are linguistically advanced. The attendee mentioned that the school council considers separating the kids and teaching them separately is considered discriminatory. Another attendee mentioned having access to better libraries with more computer terminals as key to a better education, because these libraries are a key piece of children's learning experience outside the classroom. The topic of charter schools was brought up, and the discussion touched on computer literacy and how important a skill this is for students to learn. Another attendee voiced concern over the lack of science, biology, and culinary arts classes for the students.

In the second focus group meeting, an attendee was concerned over state legislation relating to school of choice, where students have the opportunity to transfer to higher-performing schools, but there exists an inadequacy in funding for under-performing schools. This attendee was also concerned that all available education options were not communicated to parents and that only the parents who were sophisticated and knowledgeable enough were able to take advantage of transfer and funding options for their children. The discussion also touched on funding for STEM (Science, Technology, Engineering, and Math) programs, and how many schools don't have the resources to focus on these classes. Safety was another major issue discussed, as one person felt that even making it to school was dangerous because they had to cross gang lines to do so.

EMPLOYMENT

The Jobs Proximity Index measures the physical distances between place of residence and jobs by race or ethnicity. It quantifies the accessibility of a given residential neighborhood as a function of its distance to all job locations within a Core-Based Statistical Area, with larger employment centers weighted more heavily. The higher the index value, the better the access to employment opportunities for residents in a neighborhood.⁴⁴

The Labor Market Engagement Index provides a measure of unemployment rate, labor-force participation rate, and percent of the population ages 25 and above with at least a bachelor's degree, by neighborhood. The higher the score, the higher the labor force participation and human capital in a neighborhood.⁴⁵

The Los Angeles Urban County Jobs Proximity Index and Labor Market Engagement Index by race and ethnicity are presented below in Table IV.48 and Table IV.49, respectively.

Table IV.48 **HUD AFFH Table 12 – Opportunity Indicators by Race/Ethnicity** Los Angeles Urban County 2017 HUD AFFH Database

Race/Ethnicity	Jobs Proximity Index
White, Non-Hispanic	47.08
Black, Non-Hispanic	47.54
Hispanic	43.11
Asian or Pacific Islander, Non-Hispanic	47.40
Native American, Non-Hispanic	44.05

Table IV.49 **HUD AFFH Table 12 – Opportunity Indicators by Race/Ethnicity** Los Angeles Urban County 2017 HUD AFFH Database

2011 1100 711 111 Database		
Race/Ethnicity	Labor Market Engagement Index	
White, Non-Hispanic	69.40	
Black, Non-Hispanic	44.41	
Hispanic	34.90	
Asian or Pacific Islander, Non-Hispan	ic 68.31	
Native American, Non-Hispanic	48.94	

In the remaining service area, the highest Jobs Proximity Index values in the service area occurred among Asian residents in Pasadena, Black residents in Montebello, Black residents in Santa Monica, and Hispanic residents in Santa Monica (values of 66.3, 65.6, 65.0, and 61.8 respectively). The lowest Jobs Proximity Index values in the service area occurred among Asian residents in Carson, Hispanic residents in Inglewood, Black residents in Paramount, and Hispanic residents in Carson (values of 34.2, 34.5, 34.5, and 35.5 respectively).

The highest Labor Market Engagement Index values in the service area occurred among White residents in Santa Monica, Asian residents in Santa Monica, White residents in Pasadena, and Asian residents in Pasadena (values of 86.7, 82.5, 78.7, and 77.0 respectively). The lowest Labor Market Engagement Index values in the service area occurred among White residents in

⁴⁴ AFFH Data Documentation, Version 3.1, July 2016.

⁴⁵ ibid.

Lynwood, Black residents in Lynwood, Hispanic residents in Lynwood, and Hispanic residents in Palmdale (values of 13.1, 17.1, 17.3, and 18.0 respectively).⁴⁶

Disparities in Access

As seen by the Jobs Proximity Index table above, the racial and ethnic groups enjoyed a relatively similar set of index values. The range of values for the opportunity index in the service area was 32.2 value points, the lowest range of all opportunity indicator values. This would indicate no large disparity in proximity to employment for the different racial or ethnic groups across the service area.

Maps with Jobs Proximity Index values by Census tract are shown beginning with Map IV.63, with dot densities of Asian, Black, Hispanic, and White residents, along with dot densities of foreign-born residents and family status. As evidenced by these maps, the Jobs Proximity values themselves appear geographically much more random than the other indices with no discernable pattern. This would suggest no strong link in disparities in access to job proximity between racial/ethnic classes, residents born abroad, or family status within the service area.

The Labor Market Engagement Index values, however, show more variation between the classes. The range of index values in the service area across all racial or ethnic groups is 73.6, second-highest among all opportunity indices for the service area. This wide range indicates the presence of a large disparity gap in labor market engagement among the different racial or ethnic categories, as confirmed with a glance at Table IV.49 above. Even just in the Urban County, White and Asian residents have a much higher degree of labor market engagement than do Black and Hispanic residents.

Maps showing the Labor Market Engagement Index values for the service area begin with Map IV.71 on page 180, and these maps show a much more clearly defined color gradient. This strongly suggests that this index more closely aligns with the geographic racial or ethnic patterns present in the community. As shown there, the lower labor market engagement areas tend to have high populations of Hispanic residents and, to a lesser extent, Black residents. Asian and White residents live in areas with somewhat higher levels of engagement, along with Chinese-born residents (see Map IV.75 on page 184).

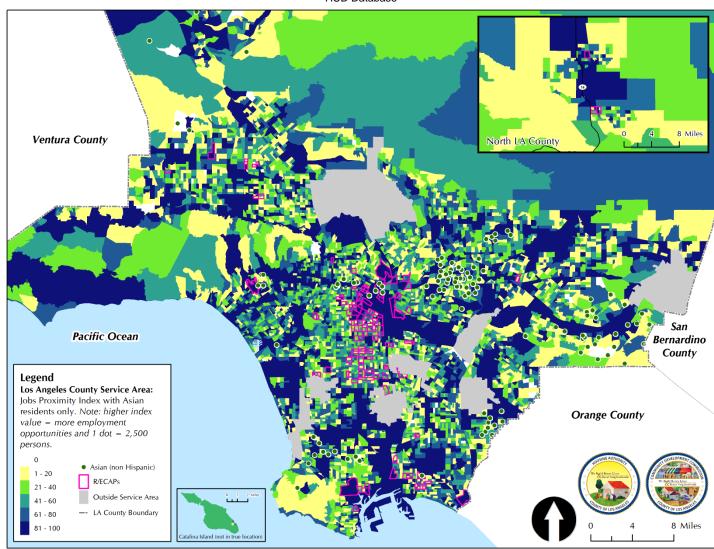
Mexican-born residents and families with children (see Map IV.76 on page 185) are clustered densely in areas with lower levels of engagement, suggesting a much higher disparity in labor market engagement with these classes.

Jobs Proximity Index values are shown for the HACoLA service area alone in Map IV.69 on page 178 and for the CDC service area alone in Map IV.70 on page 179. Map IV.77 on page 186 shows the Labor Market Engagement Index for the HACoLA service area, and Map IV.78 on page 187 shows this index for the CDC service area.

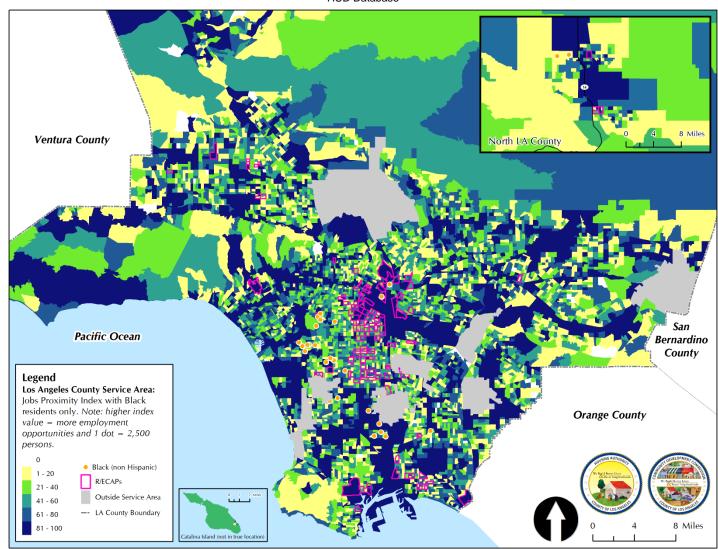
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⁴⁶ This analysis does not take into consideration the seven non-entitlement cities of the service area: Artesia, Bradbury, Hidden Hills, Industry, Palos Verdes Estates, Rolling Hills, and Vernon.

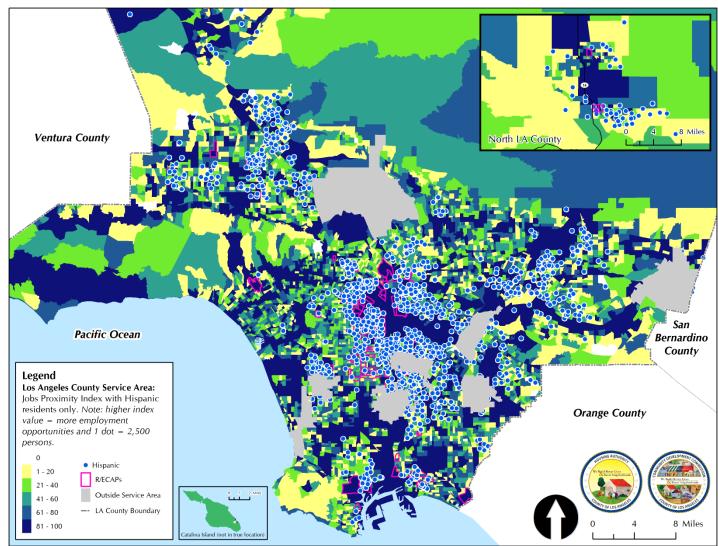
Map IV.63 Jobs Proximity Index with Asian Residents
Los Angeles County Service Area
HUD Database



Map IV.64 Jobs Proximity Index with Black Residents
Los Angeles County Service Area
HUD Database



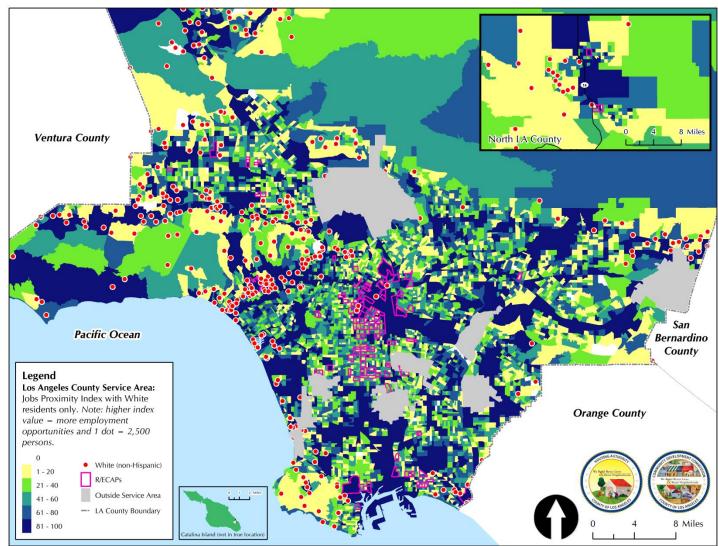
Map IV.65 Jobs Proximity Index with Hispanic Residents
Los Angeles County Service Area
HUD Database



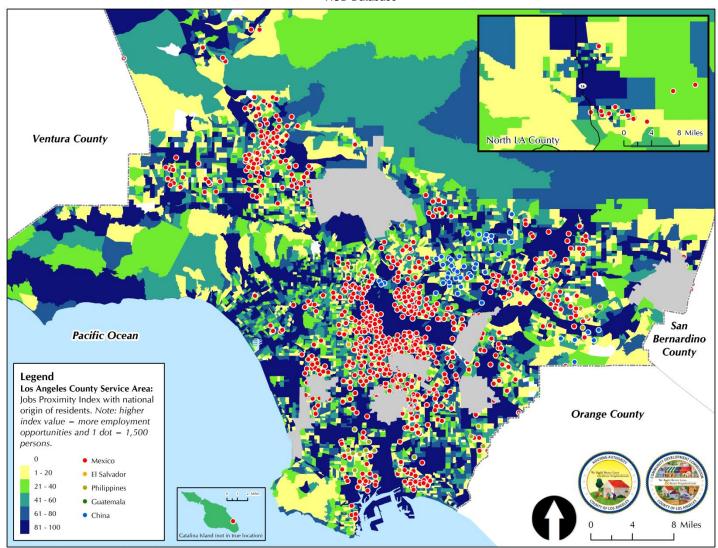
Map IV.66 Jobs Proximity Index with White Residents

Los Angeles County Service Area

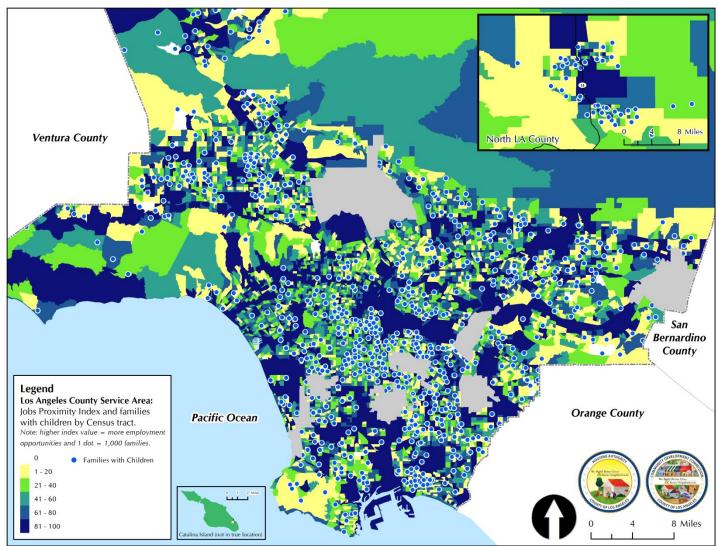
HUD Database



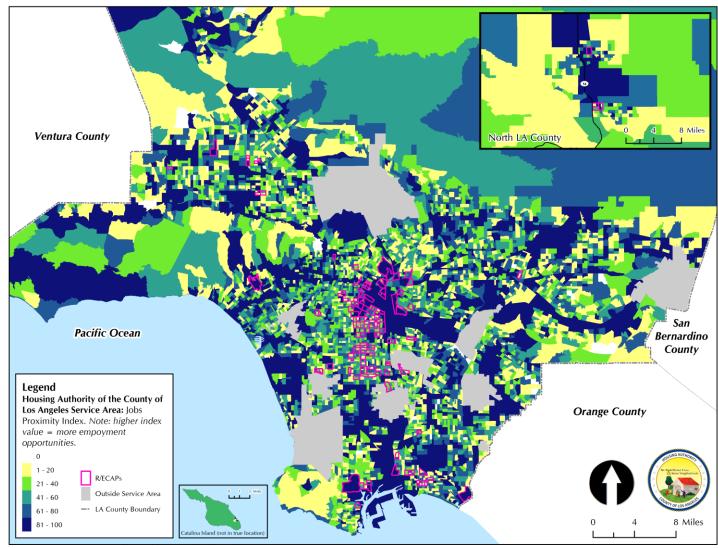
Map IV.67 Jobs Proximity Index with National Origin
Los Angeles County Service Area
HUD Database



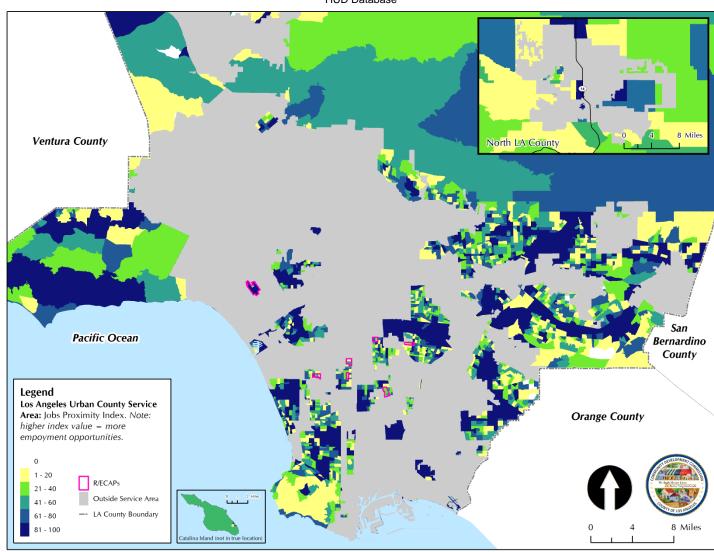
Map IV.68 Jobs Proximity Index with Family Status
Los Angeles County Service Area
HUD Database



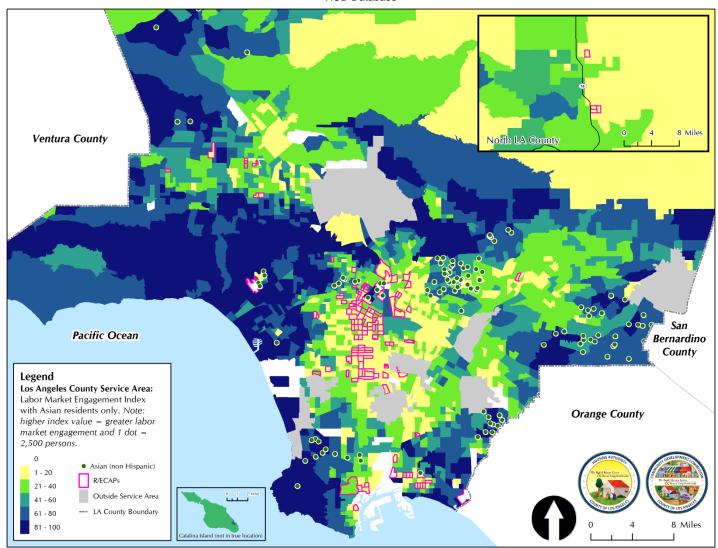
Map IV.69
HACoLA Service Area Jobs Proximity Index with R/ECAPs
HUD Database



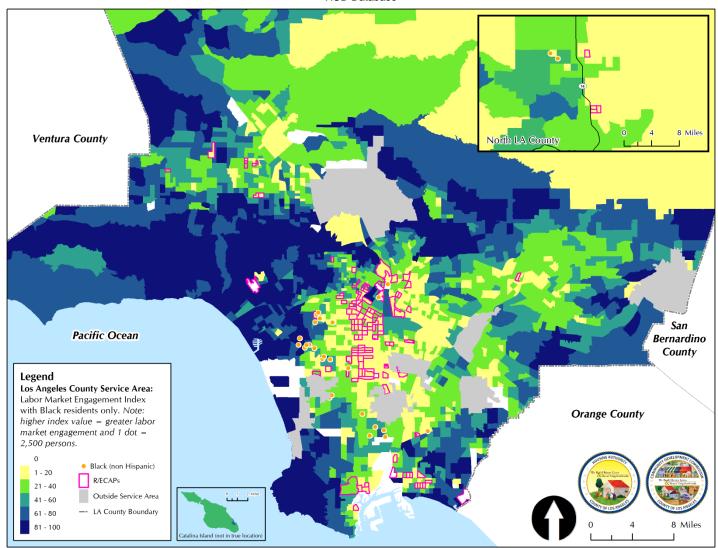
Map IV.70
CDC Service Area Jobs Proximity Index with R/ECAPs
HUD Database



Map IV.71 Labor Market Engagement Index with Asian Residents
Los Angeles County Service Area



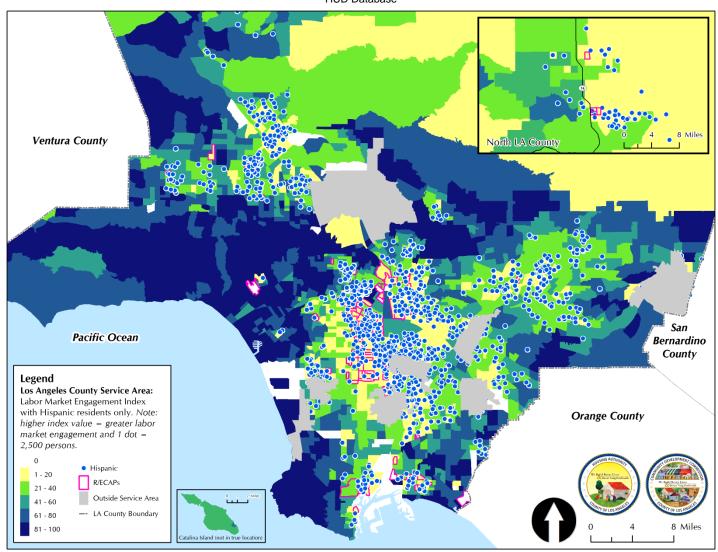
Map IV.72 Labor Market Engagement Index with Black Residents
Los Angeles County Service Area



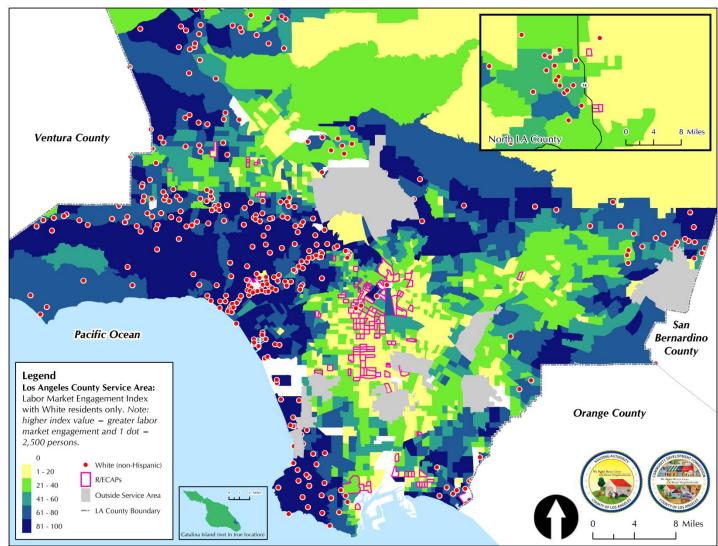
Map IV.73 Labor Market Engagement Index with Hispanic Residents

Los Angeles County Service Area

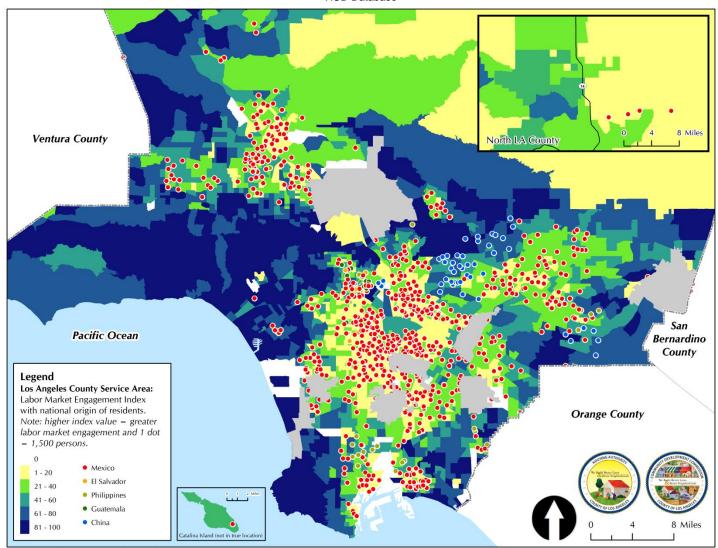
HUD Database



Map IV.74 Labor Market Engagement Index with White Residents
Los Angeles County Service Area



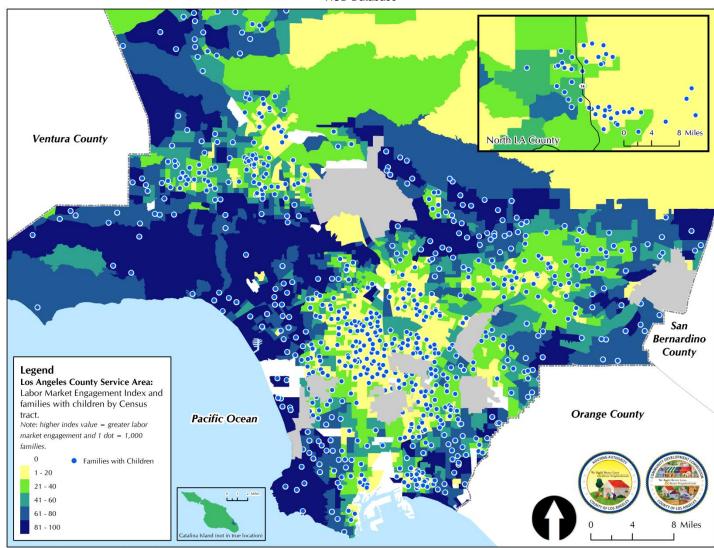
Map IV.75 Labor Market Engagement Index with National Origin
Los Angeles County Service Area



Map IV.76 Labor Market Engagement Index with Family Status

Los Angeles County Service Area

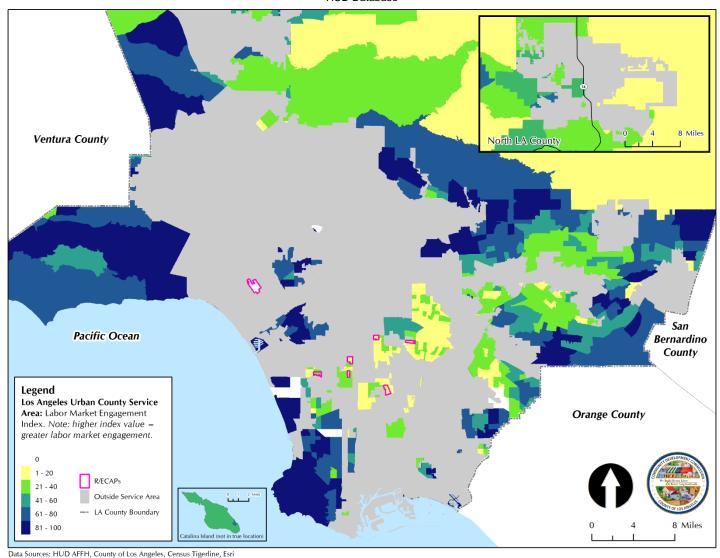
HUD Database



Ventura County North LA County San Pacific Ocean Bernardino County Legend Housing Authority of the County of Los Angeles Service Area: Labor Orange County Market Engagement Index. Note: higher index value = greater labor market engagement. Outside Service Area -- LA County Boundary 8 Miles Data Sources: HUD AFFH, County of Los Angeles, Census Tigerline, Esri

Map IV.77
HACoLA Service Area Labor Market Engagement Index with R/ECAPs
HUD Database

Map IV.78
CDC Service Area Labor Market Engagement Index with R/ECAPs
HUD Database



2017 Assessment of Fair Housing For the CDC and HACoLA

Residency Patters & Employment Opportunity

There does not appear to be a strong correlation between where someone lives and his or her ability to access areas of high employment. This pattern alone would seem to indicate that residents, regardless of their protected class, will not be put at a disadvantage to finding employment based on the neighborhood in which they live, as virtually any neighborhood in a small radius of a random point in the service area has a high Jobs Proximity Index value. There does appear to be more of a pattern in labor market engagement across the service area, but it is not clear if this is due to the neighborhood in which a resident lives or some other factor. There are likely a host of social factors to consider when assessing the ability of a person to obtain a job, but one factor that will be considered below is access to transportation. If a person lives in an area with poor access to public transit or transportation options that aren't physically accessible, it may be inordinately difficult to search for and find meaningful employment.

Unsuccessful Access to Employment

Based on the Labor Market Engagement maps shown above (beginning on page 180), it appears that Hispanic residents and Mexican-born residents live in areas of extremely low levels of engagement with the labor market, possibly indicating that these groups are among the least successful in accessing stable employment in the service area. Also of note, residents born in Guatemala, El Salvador, and Black residents tend to live in areas with low levels of labor market engagement, indicating these groups may also be unsuccessful in accessing stable employment. Also, many Census tracts containing many families with children are located in areas with relatively high labor market engagement, such as near Santa Monica, Monrovia, Arcadia, and Torrance. However, the densest cluster of families with children occurs south of downtown Los Angeles, in neighborhoods with some of the lowest categories of engagement.

Employment Focus Group Discussion

The three Employment Focus Groups were held January 10, February 1, and February 22, 2017, at Strategic Action for a Just Economy (SAJE) Headquarters, southwest of Downtown Los Angeles. A number of contributing factors were discussed by attendees, including (but not limited to): lack of available clothing for employment, lack of resources and services for working families, stigma of transgender employees, and the prevalence of low skill workers. Individuals attending these focus groups were representative of the organizations outlined in Table IV.50, below.

Table IV.50 Transportation and Jobs Focus Group Organizations Attending

Meeting #1	Meeting #2	Meeting #3
Los Angeles County Bicycle Coalition	Housing Authority of the City of Los Angeles	Housing Authority of the City of Los Angeles
AARP	Community Development Commission of County of Los Angeles	Community Development Commission of County of Los Angeles
Safe Place for Youth	City of Los Angeles	City of Los Angeles
Southern California Association of Governments	Southern California Association of Governments	Housing Authority of the County of Los Angeles
City of Los Angeles	Special Needs Network	SAJE
Housing Authority of the City of Los Angeles	Housing Authority of the County of Los Angeles	Jobs to Move America
VICA	SAJE	KIWA
Los Angeles Hospitality Training Academy	Alliance for Community Transportation	
Los Angeles LGBT Center	TAC-LA	
Housing Authority of the County of Los Angeles	California Community Foundation	
T.R.U.S.T. South LA	Housing Authority of the County of Los Angeles	
Investing in Place	Community Development Commission of County of Los Angeles	
Shared Use Mobility Center	City of Los Angeles	
LA Black Worker Center		
Community Career Development		
Women In Non-Traditional Employment		
Roles, Inc.		
Coalition for Responsible Community		
Development		
SAJE		

In the second focus group, one attendee mentioned the concern over jobs that were located far from home, where a worker might have an early shift and have to travel a long way by public transit, and busses might not be operational at that hour of the morning. Another issue mentioned concerned the lack of proper work attire. The focus group recommended supporting efforts by non-profits (presumably to provide or make said clothing), review job rules (presumably regarding the dress code), and making clothing for employees more available. Many working mothers do not have access to affordable childcare, and the one who are working minimum wage jobs can't afford childcare, the focus group thought of the following possible solutions: somehow reducing the cost of childcare, providing universal childcare, increasing baselines to allow middle classes to be eligible for childcare subsidies, ensure all inventory of affordable housing has space for childcare, and provide incentives to employers to provide childcare.

Finally, the focus group recommended the following actions to help elevate the competitiveness of low-skill workers: investment in retraining programs, paid job training to be offered, and the offer of free community college in LA.

TRANSPORTATION

The Low Transportation Cost Index measures cost of transport and proximity to public transportation by neighborhood. The index is based on estimates of transportation costs for a family that meets the following description: a 3-person single-parent family with income at 50 percent of the median income for renters for the region. The higher the index value, the lower the cost of transportation in that neighborhood.⁴⁷

The Transit Trips Index measures how often low-income families in a neighborhood use public transportation. The index is based on estimates of transit taken by a family that meets the following description: a 3-person single-parent family with income at 50 percent of the median income for renters in the Core-Based Statistical Area. The higher the index value, the more likely residents in that neighborhood are to utilize public transit.⁴⁸

The Los Angeles Urban County Low Transportation Cost Index and Transit Trips Index by race and ethnicity are presented below in Table IV.51 and Table IV.52, respectively.

Table IV.51

HUD AFFH Table 12 – Opportunity Indicators by Race/Ethnicity

Los Angeles Urban County

2017 HUD AFFH Database

2011 1102 711 111 241420400			
Race/Ethnicity	Low Transportation Cost Index		
White, Non-Hispanic	71.87		
Black, Non-Hispanic	78.06		
Hispanic	79.07		
Asian or Pacific Islander, Non-Hispanic	73.50		
Native American, Non-Hispanic	74.10		

Table IV.52
HUD AFFH Table 12 – Opportunity Indicators by Race/Ethnicity
Los Angeles Urban County

2017 HUD AFFH Database

Zon ned nin ned addec		
Race/Ethnicity	Transit Trips Index	
White, Non-Hispanic	70.01	
Black, Non-Hispanic	76.09	
Hispanic	76.50	
Asian or Pacific Islander, Non-Hispanic	73.33	
Native American, Non-Hispanic	71.38	

In the remaining service area, the highest Low Transportation Cost Index values in the service area occurred among Black residents in Santa Monica, Hispanic residents in Santa Monica, Black residents in Huntington Park, and Asian residents in Santa Monica (values of 94.7, 94.2, 93.8, and 93.4 respectively). The lowest Low Transportation Cost Index values in the service area occurred among Asian residents in Palmdale, White residents in Palmdale, Black residents in Palmdale, and Hispanic residents in Palmdale (values of 49.0, 49.7, 53.6, and 53.7 respectively).

The highest Transit Trips Index values in the service area occurred among White residents in Santa Monica, Black residents in Huntington Park, Black residents in Santa Monica, and Hispanic residents in Santa Monica (values of 87.7, 87.6, 87.3, and 87.3 respectively). The

⁴⁷ AFFH Data Documentation, Version 3.1, July 2016.

⁴⁸ ibid.

lowest Transit Trips Index values in the service area occurred among Asian residents in Palmdale, White residents in Palmdale, Black residents in Palmdale, and Hispanic residents in Palmdale (values of 53.6, 55.9, 60.0, and 60.2 respectively).⁴⁹

Disparities in Access

The Low Transportation Cost Index shows low-to-medium variation among the racial or ethnic classes in the service area, with a total range of 45.7 value points among the entitlements in the service area. Among residents in the Urban County, Table IV.51 above shows very small variation between the racial or ethnic classes, with Hispanic residents enjoying the lowest transportation costs (score of 79.1) and White residents having the highest transportation costs (score of 71.9). The rest of the service area showed a great deal more disparity, with the highest value occurring among Black residents in Santa Monica (score of 94.7) and Asian residents in Palmdale (score of 49.0). This index is likely correlated to public transportation use, as populations with greater use of public transit likely spend less income than other populations using private means (such as a car) of transportation.

Maps with Low Transportation Cost Index values by Census tract are shown below, beginning with Map IV.79. Neighborhoods with the highest scores (and thus, the lowest transportation costs) are located largely in and around Downtown Los Angeles, extending west to Santa Monica and south to Long Beach. A large group of neighborhoods with low transportation costs is located north of Downtown Los Angeles, near San Fernando. These low-cost areas correspond most closely with Hispanic and Mexican-born residents (see Map IV.81 and Map IV.83, respectively). Families with children also appear to live in low transportation cost neighborhoods (see Map IV.84)

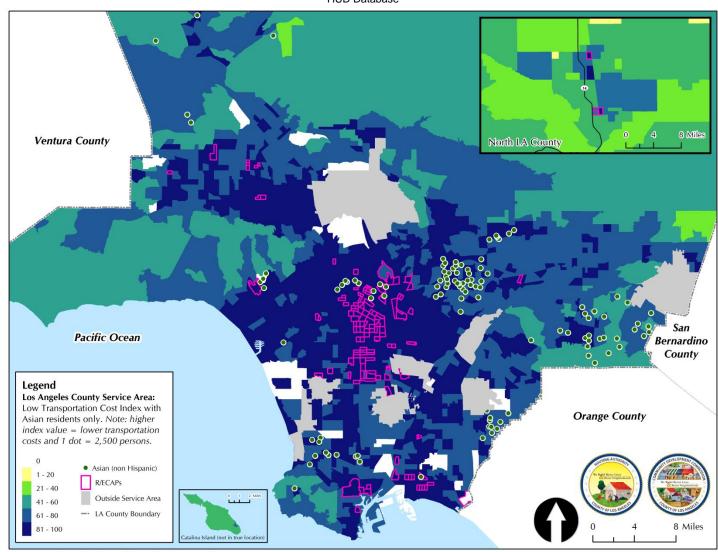
The Transit Trips index similarly shows little disparity among the racial or ethnic classes, with nearly 6.5 index value points separating the highest-scoring class (Hispanic) from the lowest-scoring class (White). And within the rest of the service area, there was only a range of 34.1 index value points, second-lowest among all indices.

Unlike the Jobs Proximity Index, which did not show much of a geographic pattern (see Map IV.63 through Map IV.67 beginning on page 172), the Transit Trips index does reveal a pattern across the service area. As can be seen on the Transit Trips map series beginning with Map IV.87 on page 200, higher Transit Trip index values can be found in and around Downtown Los Angles, near Santa Monica, Long Beach, and northwest of Downtown Los Angeles near San Fernando. The higher index values roughly follow higher Low Transportation Cost index values. Mexican-born residents and families with children can be shown to consistently live in neighborhoods with high levels of transit use (see Map IV.91 and Map IV.92, respectively). Asian residents living west of Downtown Los Angeles in and around Koreatown enjoy much higher levels of transit use than do Asian residents living in the southeastern portion of the County near Rowland Heights and Walnut (see Map IV.87 on page 200). White residents consistently live in areas with much lower rates of transit use (see Map IV.90 on page 203) than do Black and Hispanic residents (see Map IV.88 and Map IV.89 respectively).

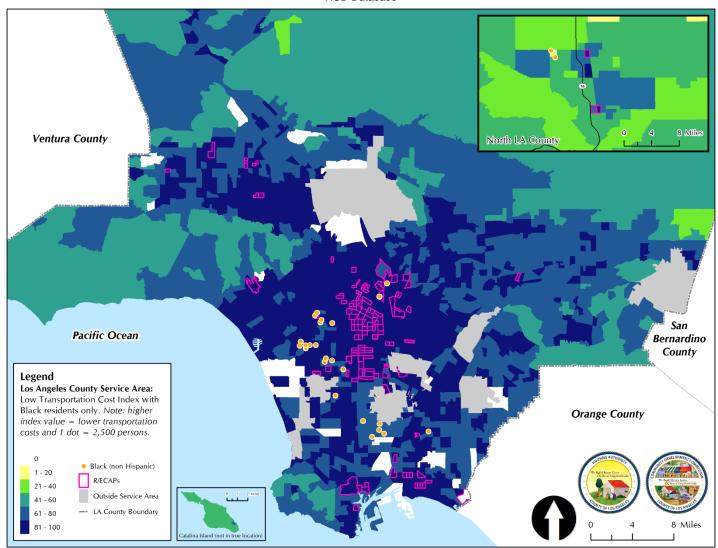
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⁴⁹ This analysis does not take into consideration the seven non-entitlement cities of the service area: Artesia, Bradbury, Hidden Hills, Industry, Palos Verdes Estates, Rolling Hills, and Vernon.

Map IV.79 Low Transportation Cost Index with Asian Residents
Los Angeles County Service Area
HUD Database



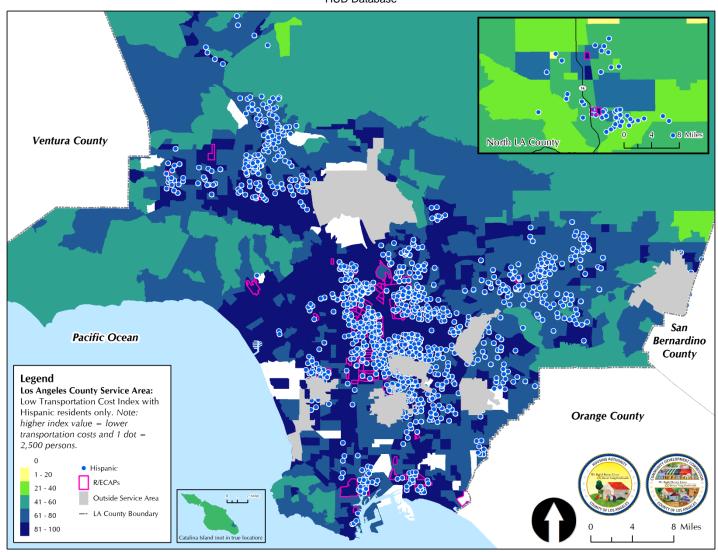
Map IV.80 Low Transportation Cost Index with Black Residents
Los Angeles County Service Area
HUD Database



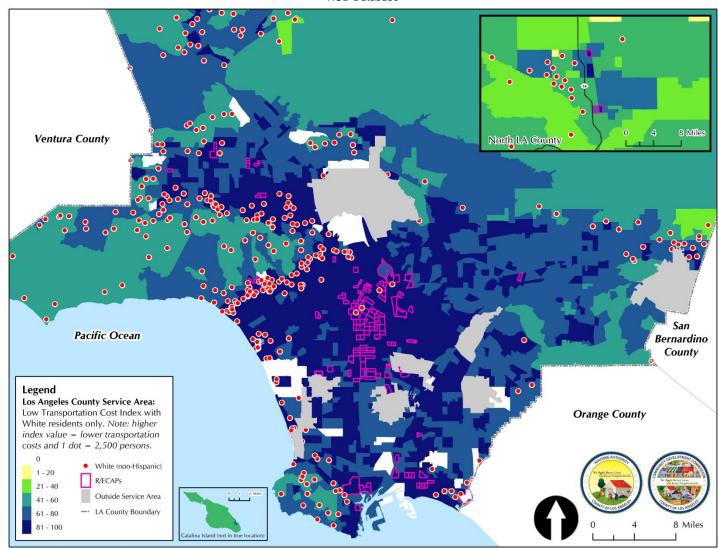
Map IV.81 Low Transportation Cost Index with Hispanic Residents

Los Angeles County Service Area

HUD Database



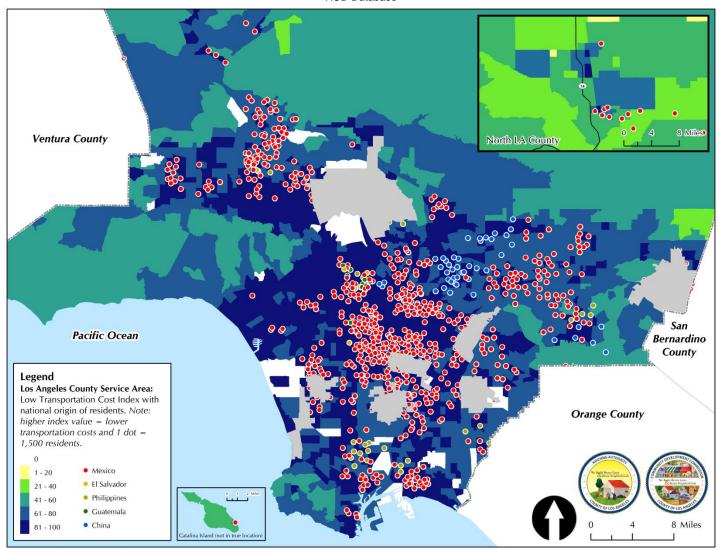
Map IV.82 Low Transportation Cost Index with White Residents
Los Angeles County Service Area



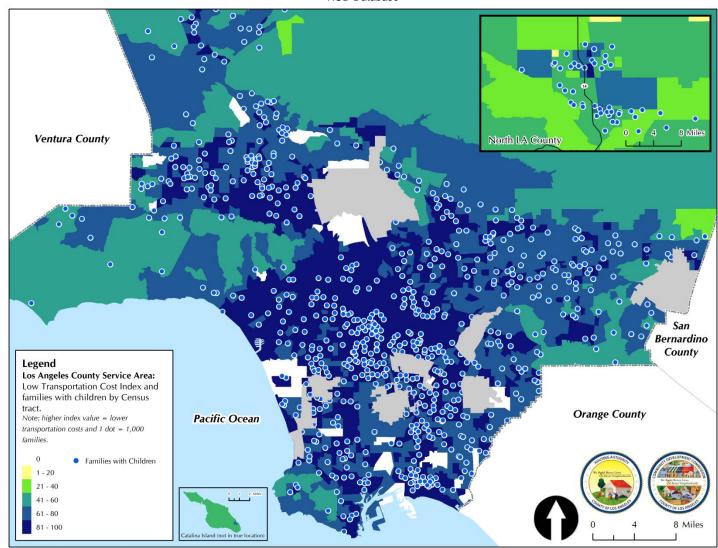
Map IV.83 Low Transportation Cost Index with National Origin

Los Angeles County Service Area

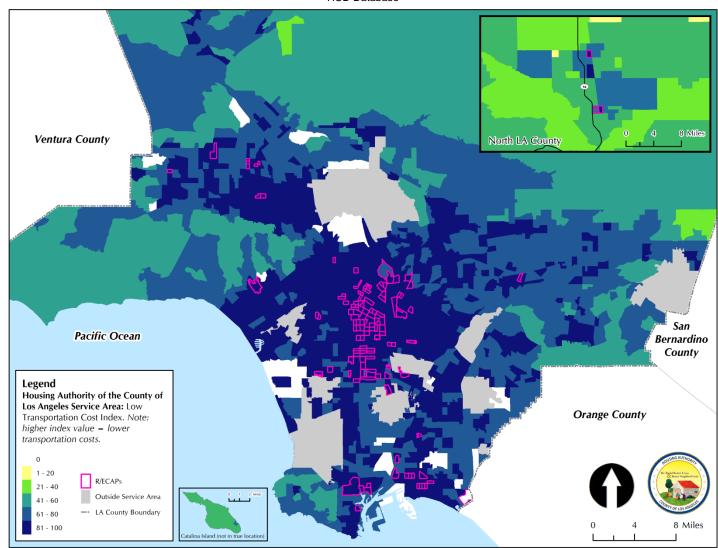
HUD Database



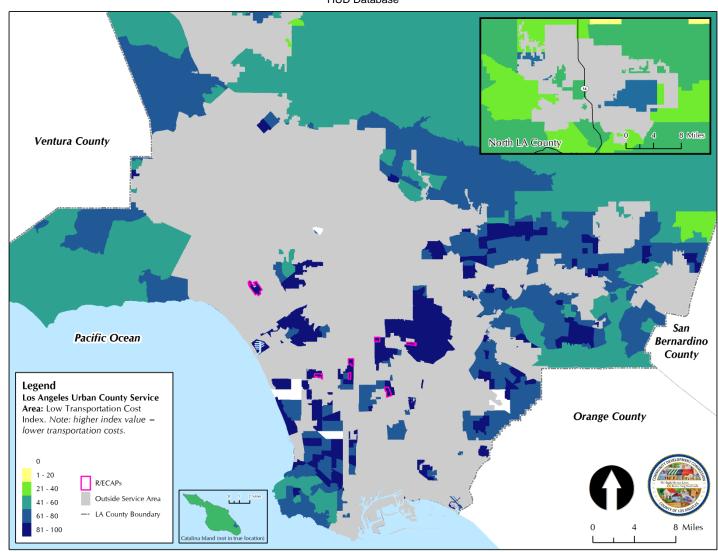
Map IV.84 Low Transportation Cost Index with Family Status
Los Angeles County Service Area
HUD Database



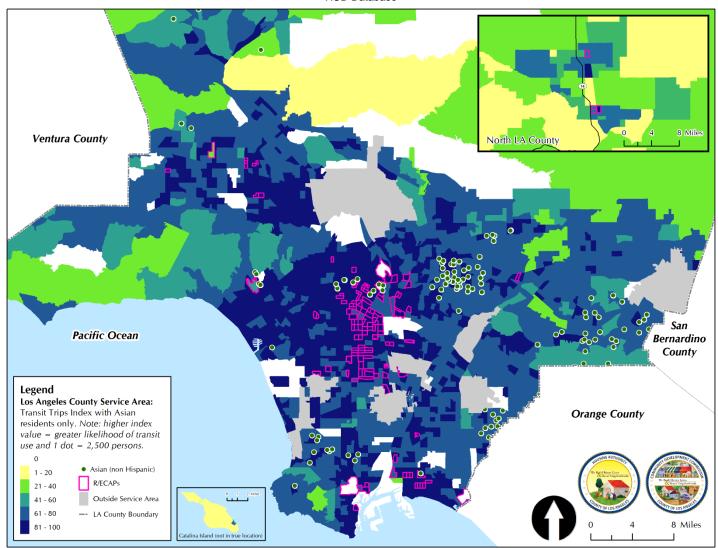
Map IV.85
HACoLA Service Area Low Transportation Cost Index with R/ECAPs
HUD Database



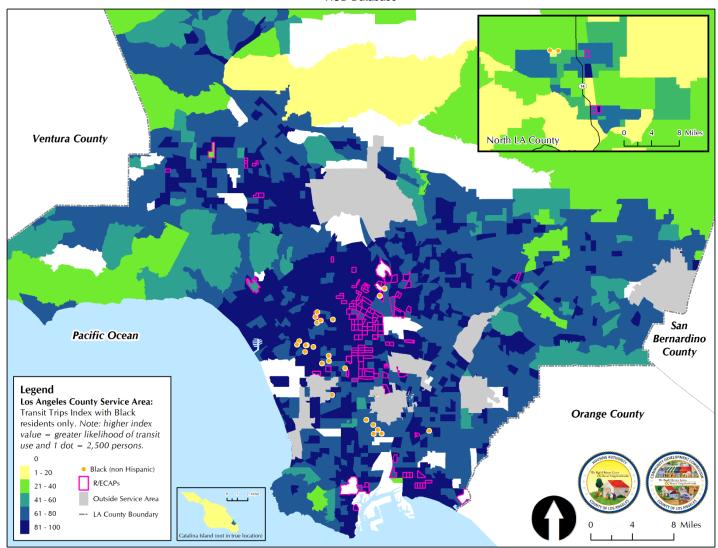
Map IV.86
CDC Service Area Low Transportation Cost Index with R/ECAPs
HUD Database



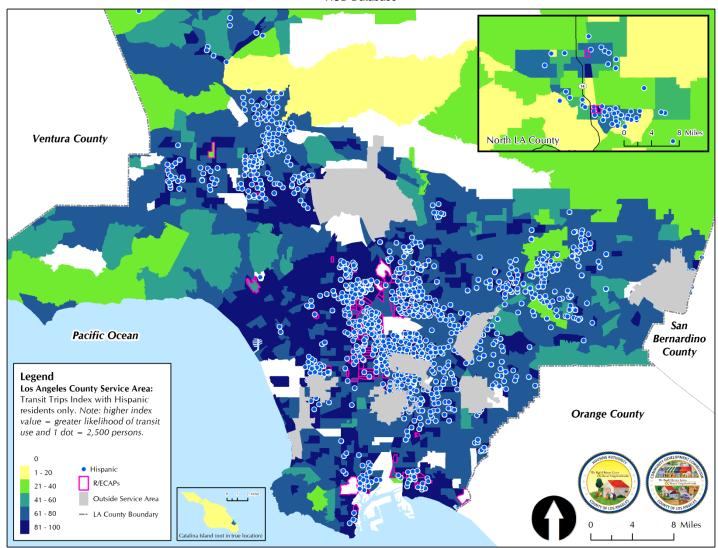
Map IV.87 Transit Trips Index with Asian Residents
Los Angeles County Service Area



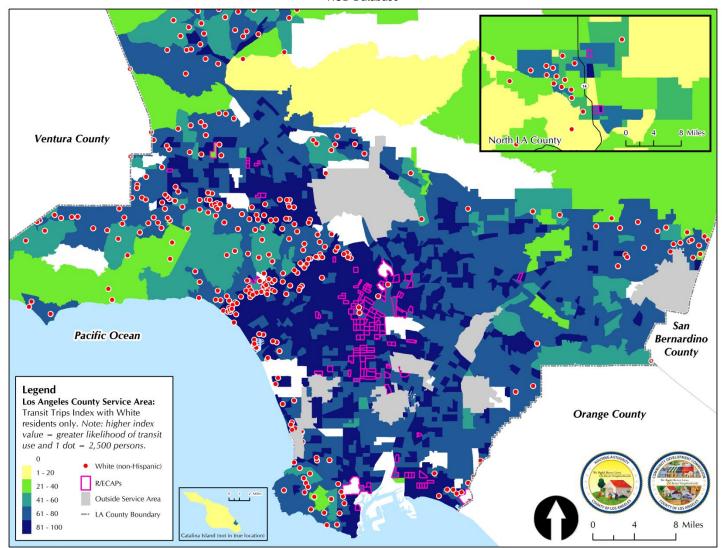
Map IV.88 Transit Trips Index with Black Residents
Los Angeles County Service Area



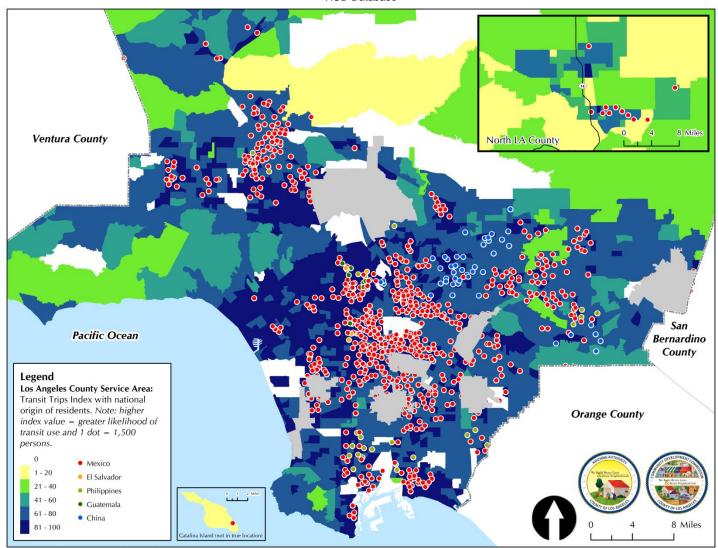
Map IV.89 Transit Trips Index with Hispanic Residents
Los Angeles County Service Area
HUD Database



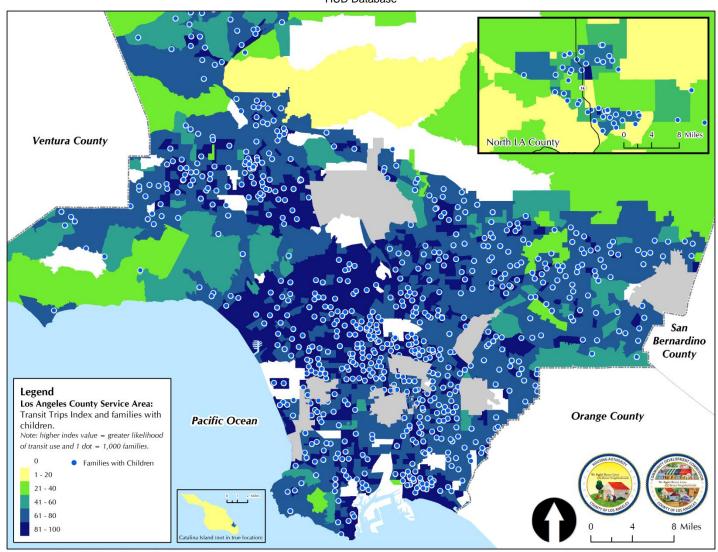
Map IV.90 Transit Trips Index with White Residents
Los Angeles County Service Area



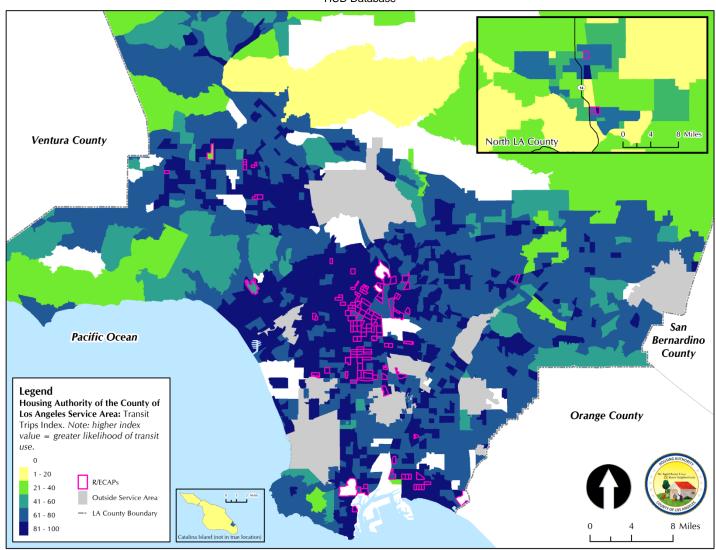
Map IV.91 Transit Trips Index with National Origin
Los Angeles County Service Area



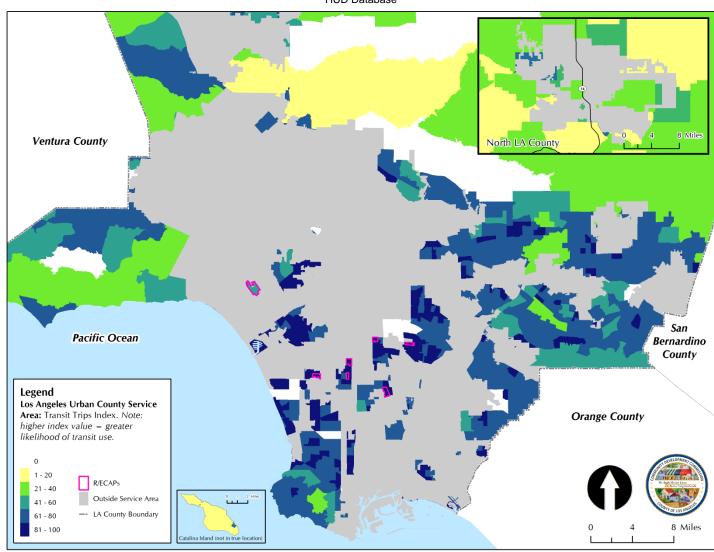
Map IV.92 Transit Trips Index with Family Status
Los Angeles County Service Area



Map IV.93
HACoLA Service Area Transit Trips Index with R/ECAPs
HUD Database



Map IV.94
CDC Service Area Transit Trips Index with R/ECAPs
HUD Database



Lack of Reliable Transportation

Many foreign-born residents in the service enjoy relatively low transportation costs (see Map IV.83) and rely heavily on public transit (see Map IV.91). For the most part, Asian, Black, and Hispanic residents live in areas with relatively low transportation costs and, not surprisingly, high levels of overall transit use. Conversely, there are larger clusters of White residents in areas with lower transit use and more expensive transportation costs, possibly due to the increased use of personal vehicles in these areas. It thus does not appear that there are significant portions of these protected classes negatively affected by a lack of access to low-cost transportation options.

Relevant Transportation Policies

The Los Angeles County Metropolitan Transportation Agency (Metro) serves as the County's transportation planner and operator.⁵⁰ In May, 2016 Metro adopted its Active Transportation Plan (Plan), which identifies strategies to increase walking, bicycling, and transit use in Los Angeles County.⁵¹ The Plan identifies the following goals:

- Improve access to transit
- Establish active transportation modes as a integral part of the countywide transportation system
- Enhance safety, remove barriers to access, or correct unsafe conditions
- Promote multiple clean transportation options to reduce criteria pollutants & greenhouse gas emissions, and improve air quality
- Improve public health through traffic safety, reduced exposure to pollutants, and design
- Foster health, equitable & economically vibrant communities where all residents have greater transportation choices and access

The Plan also identifies the following objectives:

- Identify improvements that increase first last mile access to transit by active modes
- Work with partners to create a regional active transportation network
- Develop supporting programs and Policies related to education, enforcement, encouragement, and evaluation, provide guidance for setting regional active transportation policies and guidelines
- Develop a funding strategy and explore opportunities to expedite implementation

In addition to Metro's Plan, it is also working on the Los Angeles County Long Range Transportation Plan, last updated in 2009, which outlines several objectives it hopes will be realized by 2040.⁵² Among them:

- Expand the Metro fixed guideway/busway network to over 177 stations covering nearly 230 miles
- Expand and improve bus and rail transit services throughout the County
- Add 170 carpool lane-miles that fill in critical gaps along the carpool lane network

⁵⁰ https://www.metro.net/about/about-metro/

⁵¹ https://www.metro.net/projects/active-transportation-strategic-plan/

⁵² http://media.metro.net/projects studies/images/final-2009-LRTP.pdf

- Fund arterial, signal synchronization, transportation demand management, bikeway, pedestrian, transit capital, and transportation enhancements through the Call for Projects
- Promote rideshare and other Transportation Demand Management strategies that provide options to driving along

These strategies, and the plan overall, seem committed to creating a balanced transportation network for Angelenos who drive, bike, and take public transit. In fact, according to the Long Range Plan, the county projects it will allocate over \$160 billion to bus and rail capital and operations from fiscal year 2005 to fiscal year 2040. This figure is more than 50 percent of the overall projection total for that time period, and more than the \$94 billion projected to be allocated for highways, streets, roads, and multimodal in that time period. This long-range plan, if successfully carried out, will help mitigate large disparities in access to transportation for protected classes.

Transportation Focus Group Discussion

The three Transportation Focus Groups were held January 10, February 1, and February 22 at Strategic Action for a Just Economy (SAJE) Headquarters, southwest of Downtown Los Angeles. Individuals attending these focus groups were representative of the organizations outlined in Table IV.53, below.

Table IV.53
Transportation and Jobs Focus Group
Organizations Attending

Mosting #4 Mosting #2 Mosting #2				
Meeting #1	Meeting #2	Meeting #3		
Los Angeles County Bicycle Coalition	Housing Authority of the City of Los	Housing Authority of the City of Los		
	Angeles	Angeles		
AARP	Community Development Commission of	Community Development Commission of		
	County of Los Angeles	County of Los Angeles		
Safe Place for Youth	City of Los Angeles	City of Los Angeles		
Southern California Association of	Southern California Association of	Housing Authority of the County of Los		
Governments	Governments	Angeles		
City of Los Angeles	Special Needs Network	SAJE		
Housing Authority of the City of Los	Housing Authority of the County of Los	Laborta Maria Amerika		
Angeles	Angeles	Jobs to Move America		
VICA	SAJE	KIWA		
Los Angeles Hospitality Training	Allianae for Community Transportation			
Academy	Alliance for Community Transportation			
Los Angeles LGBT Center	TAC-LA			
Housing Authority of the County of Los	California Community Foundation			
Angeles				
T.R.U.S.T. South LA	Housing Authority of the County of Los			
T.K.U.S.T. SOUIT LA	Angeles			
Investing in Disc.	Community Development Commission of			
Investing in Place	County of Los Angeles			
Shared Use Mobility Center	City of Los Angeles			
LA Black Worker Center				
Community Career Development				
Women In Non Traditional Employment				
Roles, Inc.				
Coalition for Responsible Community				
Development				
SAJE				

The transportation focus groups discussed the general lack of bus pass availability and expressed the desire for them to be reduced in cost. One attendee in the second focus group was concerned about the lack of reliable public transportation especially in the early morning hours, when a worker might have to travel a great distance to work a graveyard shift at a minimum wage job. With regards to this issue, the focus group recommended doubling the bus fleet, keeping families in areas near transportation, locating transportation near affordable housing, incentivizing employers to provide transportation, and continue the work of the MTA.

Another issued discussed at the focus group involved access to public transit specifically for seniors and disabled residents, and to address this, the group suggested constructing shaded bus stops, increasing space on the bus for disabled persons, and simply increasing access.

LOW POVERTY EXPOSURE

The Low Poverty Index uses rates of family poverty by household (based on the federal poverty line) to measure exposure to poverty by neighborhood. A higher score indicates less exposure to poverty for a given neighborhood.⁵³ Table IV.54, below, shows these index values for the Los Angeles Urban County.

Table IV.54

HUD AFFH Table 12 – Opportunity Indicators by Race/Ethnicity

Los Angeles Urban County

2017 HUD AFFH Database

Race/Ethnicity	Low Poverty Index
White, Non-Hispanic	70.81
Black, Non-Hispanic	48.72
Hispanic	41.00
Asian or Pacific Islander, Non-Hispanic	68.55
Native American, Non-Hispanic	55.55

Disparities in Access

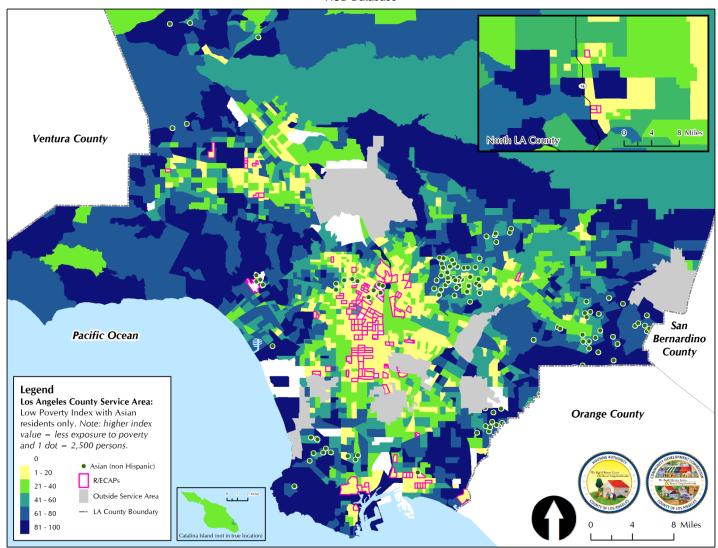
The following maps, beginning with Map IV.95 below, show access to low poverty within the service area. Areas around Downtown Los Angeles, showing the highest Low Poverty Index values, are generally populated with Hispanic residents, although there are clusters of Hispanic residents living in areas with much less exposure to low poverty, such as near Santa Clarita and in eastern Los Angeles County (see Map IV.97 below).

Black residents and many foreign-born residents are clustered in areas with smaller Low Poverty Index values, with Asian residents living in areas with less exposure to low poverty areas in eastern Los Angeles County. White residents are much sparser in low income areas of the service area (see Map IV.98 below). Finally, most families with children living south of downtown Los Angeles are located in neighborhoods with greater exposure to poverty, while those living further north near Santa Clarita and to the south near Torrance and Lakewood have significantly less exposure to poverty.

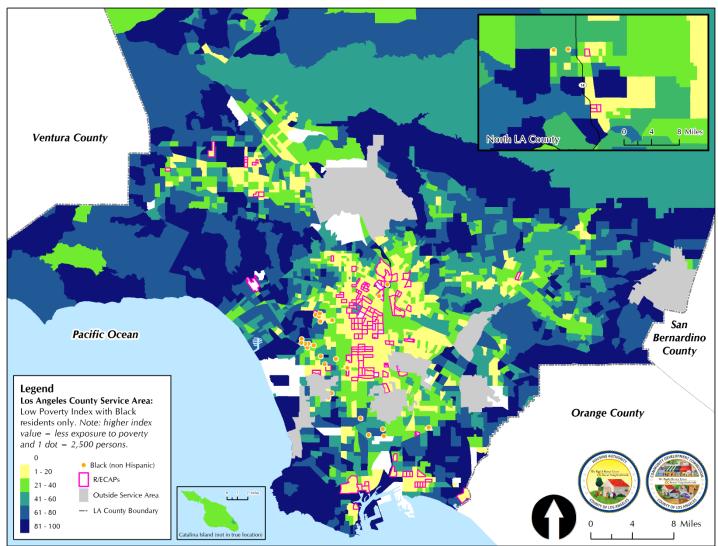
Low Poverty Index values for the HACoLA and Urban County service areas are respectively shown beginning with Map IV.101 on page 217.

⁵³ AFFH Data Documentation, Version 3.1, July 2016.

Map IV.95 Low Poverty Index with Asian Residents
Los Angeles County Service Area



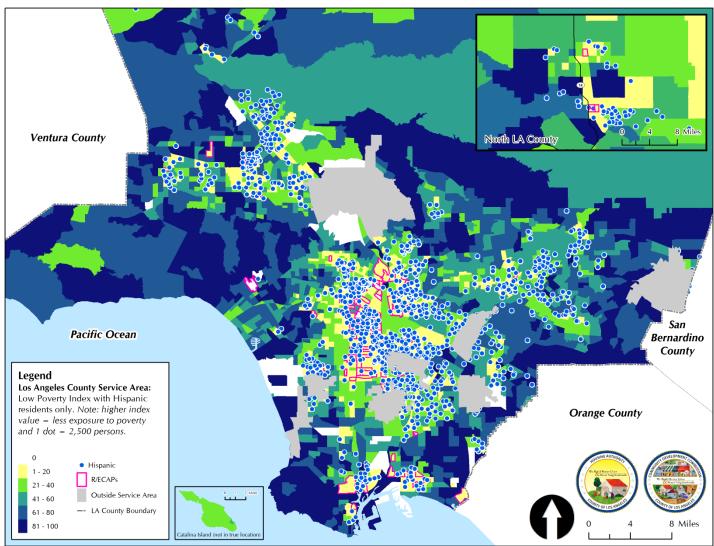
Map IV.96 Low Poverty Index with Black Residents
Los Angeles County Service Area



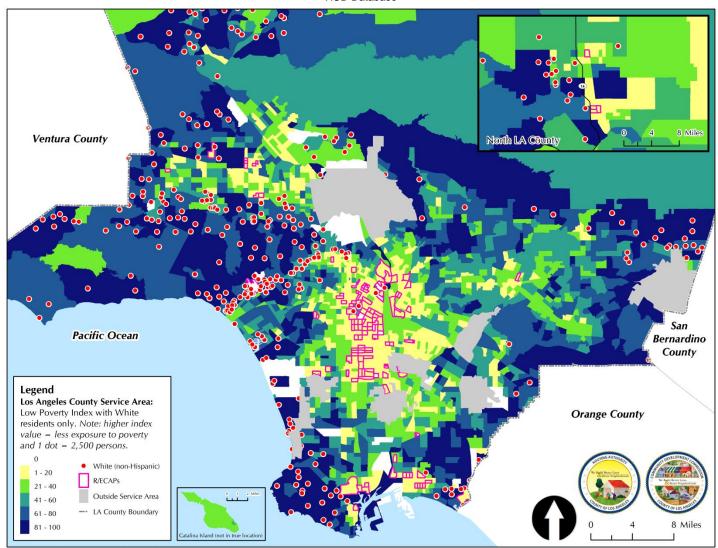
Map IV.97 Low Poverty Index with Hispanic Residents

Los Angeles County Service Area

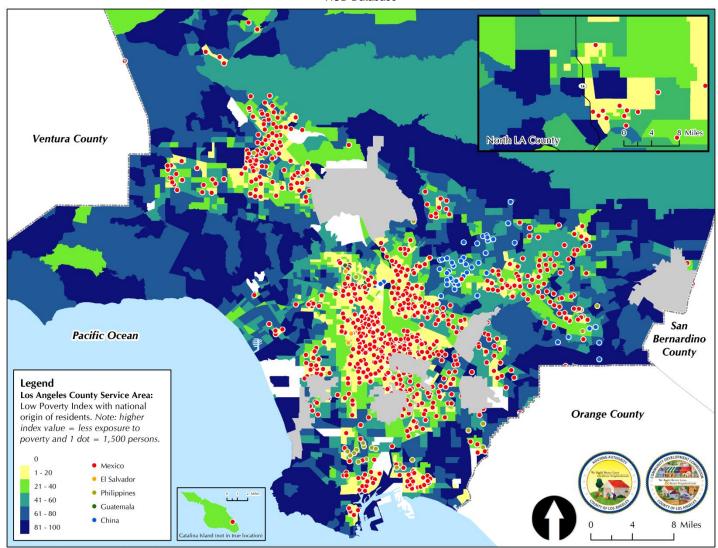
HUD Database



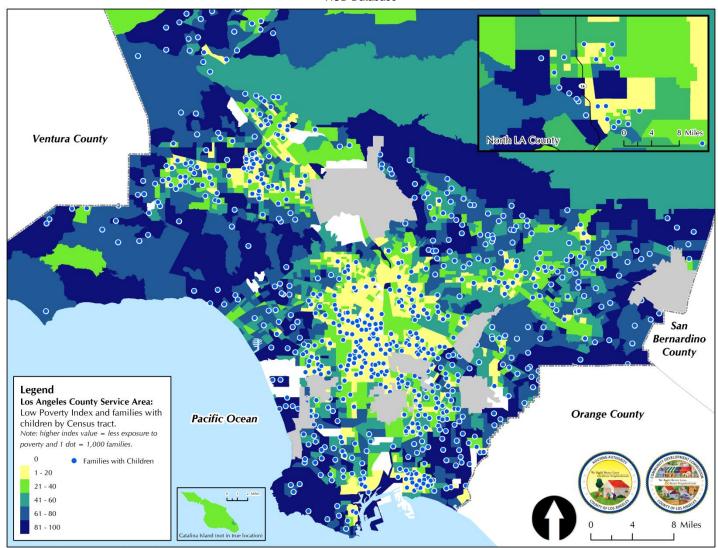
Map IV.98 Low Poverty Index with White Residents
Los Angeles County Service Area



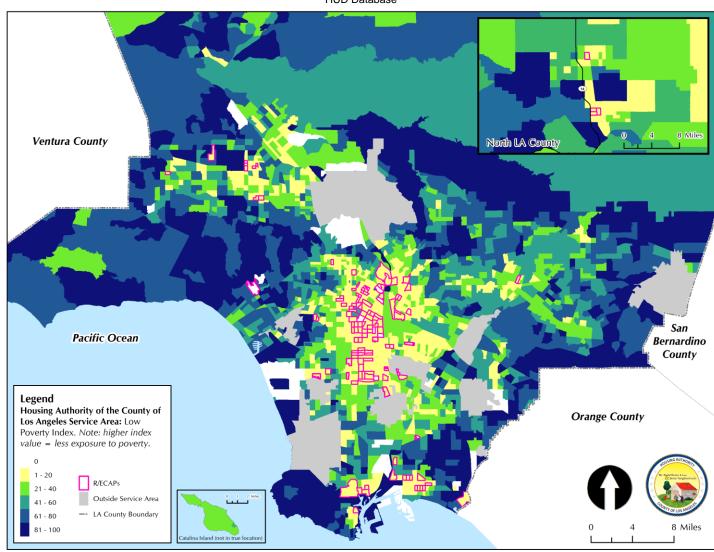
Map IV.99 Low Poverty Index with National Origin
Los Angeles County Service Area



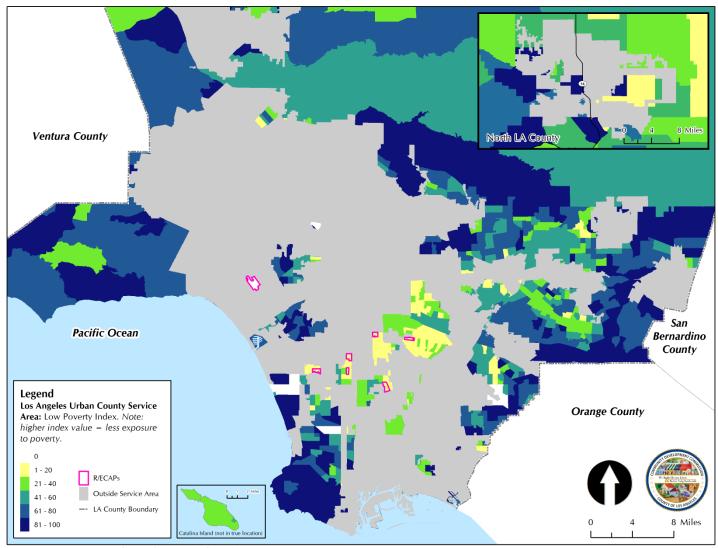
Map IV.100
Low Poverty Index with Family Status
Los Angeles County Service Area



Map IV.101
HACoLA Service Area Low Poverty Index with R/ECAPs
HUD Database



Map IV.102
CDC Service Area Low Poverty Index with R/ECAPs
HUD Database



Role of Place

Based on the maps of low poverty shown above, it appears that geography plays a role in shaping the extent to which someone is exposed to low poverty. Many areas in western LA County and the southeastern peninsula of the County showing very little exposure to low poverty, while neighborhoods more centrally located have higher exposure to low poverty.

Groups Most Affected

As stated above, Black residents and many foreign-born residents are clustered in areas with smaller Low Poverty Index values, with Asian residents living in areas with less exposure to low poverty areas in eastern Los Angeles County. White residents are much sparser in low income areas of the service area. This indicates that Black and a large portion of Hispanic residents are most affected by low poverty, as are many foreign-born residents and families with children.

Relevant Policies

The state of California created the California Housing Partnership (CHP) more than 25 years ago as a private nonprofit organization with a public mission: to monitor, protect, and augment the supply of homes affordable to lower-income Californians and to provide leadership on affordable housing finance and policy. Since 1988, the CHP has assisted more than 100 nonprofit and local government housing organizations leverage more than \$8 billion in private and public financing to create and preserve 30,000 affordable homes.⁵⁴ In May 2016, the CHP produced a report outlining the following policy recommendations, specific to Los Angeles County, to address the County's poverty and housing crisis:

- The County should fully fund its new Affordable Housing Program as called for in the Board of Supervisor's October 2015 motion
- Cities in the County should dedicate a majority of the residual tax increment from the dissolution of redevelopment agencies to create affordable rental homes
- Enact an affordable housing impact fee on new development
- Adopt or strengthen regulations to limit rent increases to reasonable cost of living adjustments
- Explore new revenue raising measures, including ballot initiatives
- Award entitlement incentives to developers who include affordable homes
- Offer up-zoning incentives only to developers who do not remove rent-controlled or other currently affordable homes from the market and those who provide one-for-one replacement prior to removing currently affordable homes from the market to avoid displacement.⁵⁵

These policy recommendations, if implemented, will provide access of low poverty areas to protected classes by enabling them to live in affordable homes in low-poverty areas, homes that would normally be too expensive for these classes to afford.

⁵⁴ http://chpc.net/wp-content/uploads/2016/05/Los-Angeles-County.pdf.

⁵⁵ ibid.

ENVIRONMENTALLY HEALTHY NEIGHBORHOODS

The Environmental Health Index summarizes potential exposure to harmful toxins at a neighborhood level. It is based on EPA estimates of air quality carcinogenic, respiratory and neurological toxins, and the higher the index value, the less exposure to harmful toxins.⁵⁶ The values for this are presented below for the Los Angeles Urban County in Table IV.55.

Table IV.55
HUD AFFH Table 12 – Opportunity Indicators by Race/Ethnicity

Los Angeles Urban County 2017 HUD AFFH Database

Race/Ethnicity	Environmental Health Index
White, Non-Hispanic	40.85
Black, Non-Hispanic	27.36
Hispanic	24.44
Asian or Pacific Islander, Non-Hispanic	34.37
Native American, Non-Hispanic	35.02

In the remaining service area, the highest Environmental Health Index values in the service area occurred among all race/ethnic classes in Palmdale (values of 84.4 to 82.8) and all race/ethnic classes in Lancaster (values of 78.4 to 75.3). The lowest Environmental Health Index values in the service area occurred among all race/ethnic classes in Inglewood (values of 1.4 to 2.0) and all race/ethnic classes in Huntington Park (values of 5.7 to 7.4). ⁵⁷

Disparities in Access

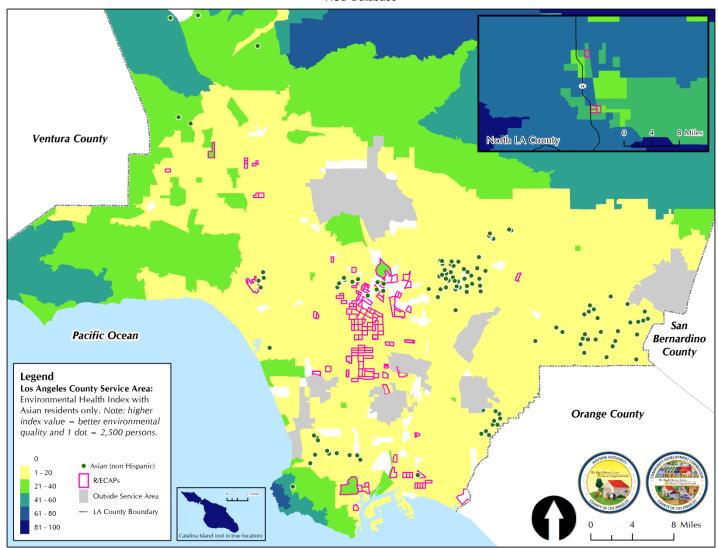
Of all the Access to Opportunity Indicators measuring the service area, the Environmental Health Index has the widest range, spanning a maximum score of nearly 85 by all racial or ethnic classes in Palmdale to minimum scores of less than 10 in Inglewood and Huntington Park. This would seem to indicate a high degree of disparity among neighborhood health, depending largely on geography. Northern Los Angeles County entitlements scored very well on this index, while cities in central and southern Los Angeles County did not. The San Gabriel Mountains stand as a significant geographic feature that may provide some buffer protection to cities such as Lancaster and Palmdale from low air quality and toxins from the south.

As shown in the maps below, the lowest Environmental Health index values in the service area occur in most of central, southern, and eastern Los Angeles County. This directly overlaps with most population clusters of Asian, Black, and Hispanic residents, although there is a significant portion of Hispanic residents living in (much cleaner) northern Los Angeles County (see Map IV.105 below). White populations living near Santa Clarita, Rolling Hills and Palos Verdes Estates, and around Lancaster/Palmdale enjoy much higher levels of environmental quality (see Map IV.106 below). Most foreign-born residents live in areas with extremely low levels of environmental health (see Map IV.107 below), as do many families with children (Map IV.108).

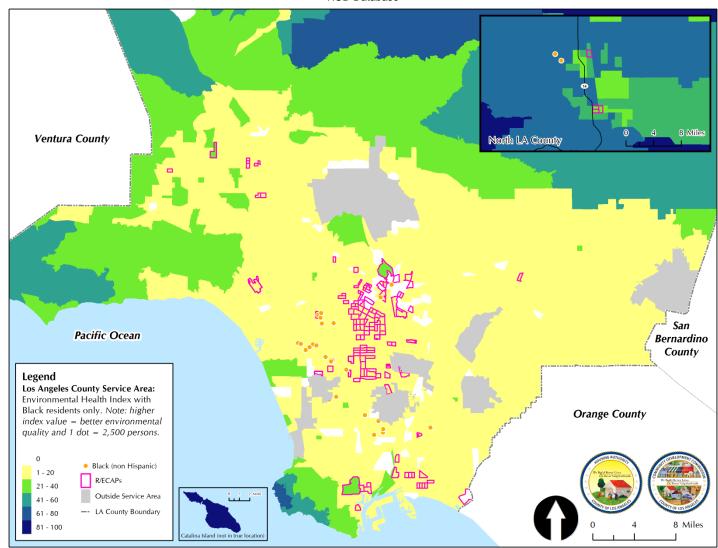
⁵⁶ AFFH Data Documentation, Version 3.1, July 2016.

⁵⁷ This analysis does not take into consideration the seven non-entitlement cities of the service area: Artesia, Bradbury, Hidden Hills, Industry, Palos Verdes Estates, Rolling Hills, and Vernon.

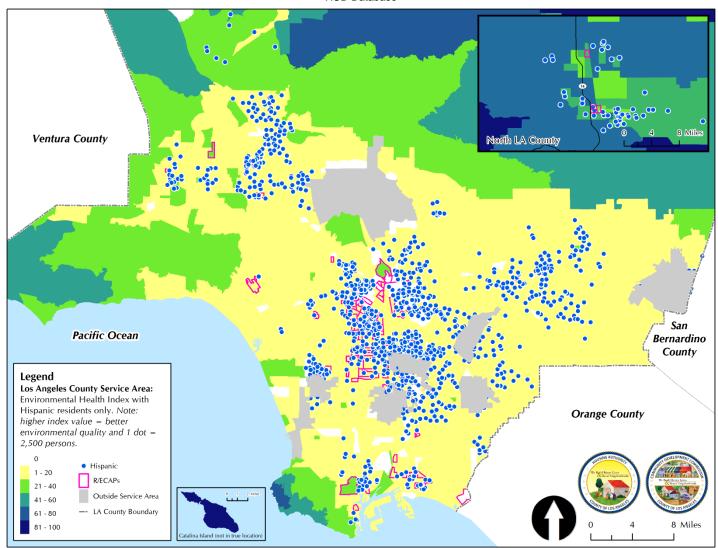
Map IV.103
Environmental Health Index with Asian Residents
Los Angeles County Service Area
HUD Database



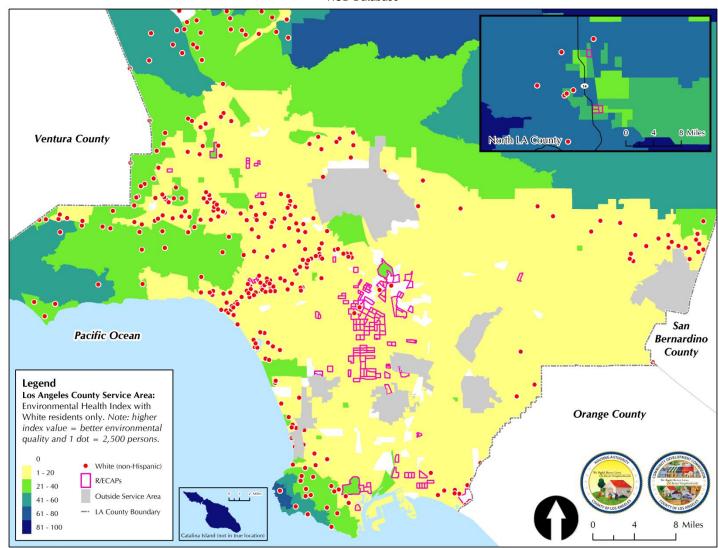
Map IV.104
Environmental Health Index with Black Residents
Los Angeles County Service Area
HUD Database



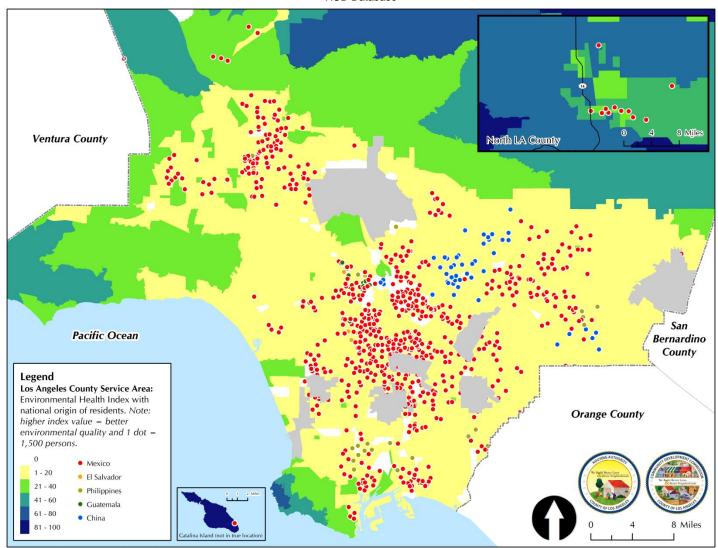
Map IV.105
Environmental Health Index with Hispanic Residents
Los Angeles County Service Area
HUD Database



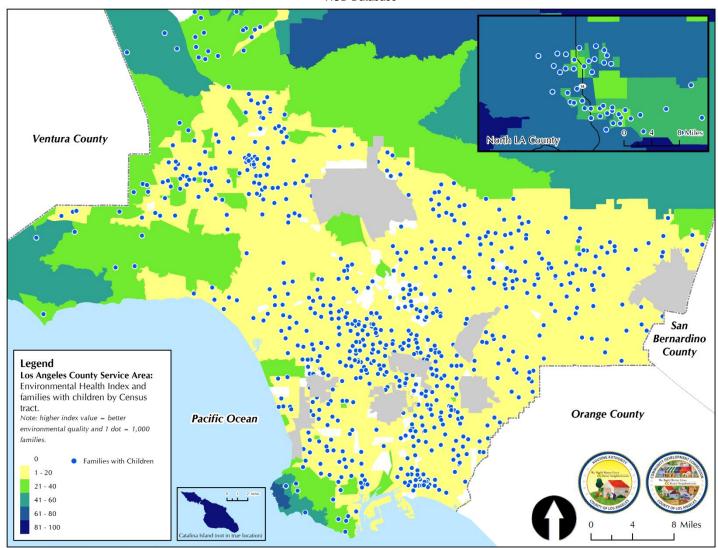
Map IV.106 Environmental Health Index with White Residents Los Angeles County Service Area HUD Database



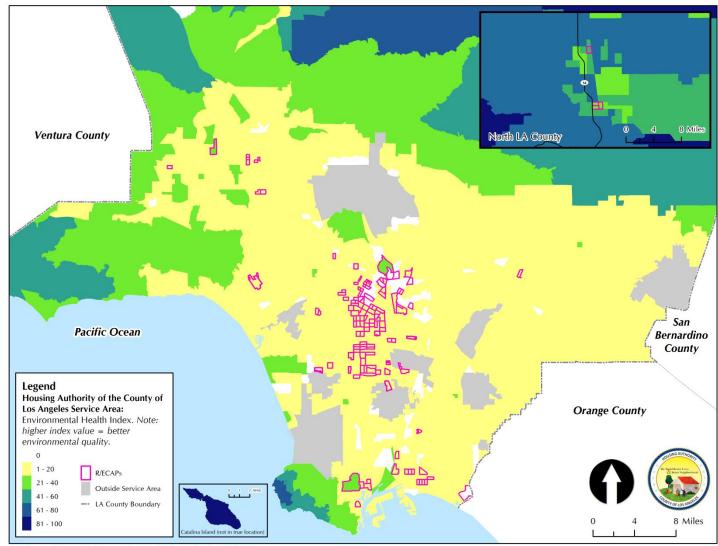
Map IV.107
Environmental Health Index with National Origin
Los Angeles County Service Area
HUD Database



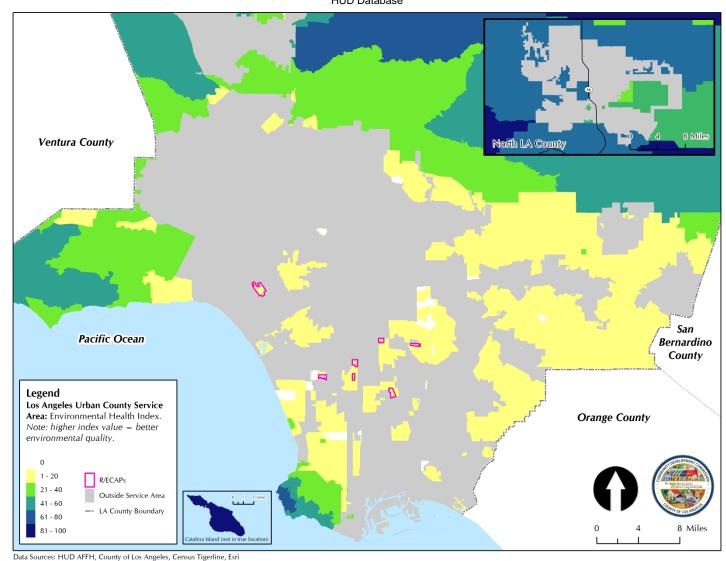
Map IV.108
Environmental Health Index with Family Status
Los Angeles County Service Area
HUD Database



Map IV.109
HACoLA Service Area Environmental Health Index with R/ECAPs
HUD Database



Map IV.110
CDC Service Area Environmental Health Index with R/ECAPs
HUD Database



2017 Assessment of Fair Housing For the CDC and HACoLA

Healthy Neighborhoods Focus Group Discussion

The three Healthy Neighborhoods Focus Groups were held January 11, February 2, and February 23 at the Los Angeles County Community Development Commission offices in Alhambra. Individuals attending these focus groups were representative of the organizations outlined in Table IV.56, below.

Table IV.56
Healthy Neighborhoods Focus Group
Organizations Attending

Meeting #1	Meeting #2	Meeting #3
Los Angeles County Department of Public Health	Coalition for Economic Survival	Coalition for Economic Survival
UCLA Law	Los Angeles County Department of Public Health	Housing Authority of the City of Los Angeles
Housing Authority of the County of Los Angeles	Housing Authority of the City of Los Angeles	Los Angeles County Department of Public Health
City of Los Angeles	Thai Community Development Center	Thai Community Development Center
Legal Aid Foundation of Los Angeles	Eastern Los Angeles Regional Center	Eastern Los Angeles Regional Center
Advanced Projects	City of Los Angeles	City of Los Angeles
Pacoima Beautiful	City of Chino	City of Chino
Neighborhood Legal Services of Los County	Social Model Recovery Systems	Social Model Recovery Systems
University of Southern California	FAME Corporations	FAME Corporations
Local Initiatives Support Corporation	UCLA	UCLA
Coalition for Economic Survival	A Community of Friends	University of Southern California
Thai Community Development Center	Legal Aid Foundation of LA	Housing Authority of the County of Los Angeles
Eastern Los Angeles Regional Center	University of Southern California	South Central Los Angeles Regional Center
City of Chino	Advanced Projects	Advanced Projects
Housing Authority of the City of Los Angeles	United Way of Greater Los Angeles	The Children's Clinic "Serving Children and their Families"
Social Model Recovery Systems	Pacoima Beautiful	Pacoima Beautiful
FAME Corporations	Neighborhood Legal Services of Los County	Neighborhood Legal Services of Los County
Smoke Free Apartments	Local Initiatives Support Corporation	Glendale Adventist Medical Center
Esperanza Community Housing	Smoke Free Apartments	CARE 1st
Los Angeles Housing and Community Development	LA City Health Commission	Bassett Unified School District
Bassett Unified School District	South Central Los Angeles Regional Center	Lawyer's Committee
	The Children's Clinic "Serving Children and their Families"	Enterprise Community
	Bassett Unified School District	

The healthy neighborhoods focus group discussed the Green Zone Program, an initiative which seeks to address the environmental justice issues within the unincorporated communities in Los Angeles County. The program employs strategies involving land use policy, prevention and mitigation, community engagement, and the development of a toxic hotspots map. One attendee mentioned concern over the difficulty with which one can even report an environmental problem, citing the disparate systems various agencies employ to track such problems. The group encouraged more coordination between these agencies and groups. Another attendee mentioned a dearth of healthy food options in their neighborhood, a term the USDA calls food desert. To combat this, the focus group proposed several actions to remedy this: mapping grocery stores to identify disparities in healthy food access, incentivize tore owners to locate to a low-access community, improve marketing and promotion of an area,

⁵⁸ http://planning.lacounty.gov/greenzones.

support local coops, reach out to local vendors and businesses, provide cooking demos at food distributors, and the provision of more farmers markets. Pertaining to healthy food access, the group also discussed a topic called food insecurity, and wanted to see an increased enrollment into food assistance programs, including CalFresh and WIC, a strengthening of the CalWorks program, encouragement of individuals and organizations to divert non-perishable and unspoiled perishable foods to local food donation centers, and an expansion of distribution channels for food waste reduction and food recovery programs.

The focus group also discussed matters pertaining to air pollutions and environmental hazards, pointing out that poor land use and zoning can often situate these unwanted toxins near housing and, often, near low-income or minority housing. The group hoped to see targeted efforts to bring industrial facilities into compliance with air quality and toxic emissions standards in communities highly burdened by air pollution and toxic emissions. The group also mentioned developing business support programs and incentives for toxic emitters to reduce emissions and pollutions; considering proximity to major sources of air pollution in land use planning; increasing bike and pedestrian improvements in disadvantaged communities and/or R/ECAP areas; collaboration across sectors to support policies that reduce greenhouse gas emissions; and a consideration of proximity to major sources of air pollution in land use planning.

Another major topic of discussion in the focus group revolved around access to safe and active transportation, including walking and biking. For greater access to active transportation, the focus group suggested supporting Vision Zero initiatives at city and county level, adopting and implementing transportation policies at a local level that promote safe and convenient access to community resources using active transportation (bicycle and pedestrian master plans, safe routes to school initiatives, complete streets policies), and investment in streetscape improvements in R/ECAP areas.

PATTERNS IN DISPARITIES IN ACCESS TO OPPORTUNITY

In the five areas of opportunity identified by HUD (education, employment, transportation, low poverty, and environmental health), patterns emerge across the service area, especially when examining the maps on the preceding pages. For instance, much of the Hispanic population living near Downtown Los Angeles is exposed to some of the lowest index values of any racial or ethnic group in the service area. Correspondingly, many Mexican-, Guatemalan- and El Salvadorian-born residents live among areas suffering from these low index values. Higher environmental hazards, lower levels of labor market engagement, higher rates of poverty, and underperforming schools, plague these communities. However, these communities do have access to low transportation costs and, in general, leverage public transit more than most other protected classes.

Black residents live in areas missing much of the same access to opportunity as many of the Hispanic residents, but to a somewhat lesser extent. Much of the larger Black population clusters appear on the map further away from Downtown Los Angeles, to the west. While still very low on the environmental health index, these neighborhoods generally score a little higher on the Low Poverty Index (i.e., they are not as exposed to low poverty) and School Proficiency Index (i.e., Black residents have access to slightly higher quality schools). But as

with Hispanic populations, the largest clusters of Black residents live in areas with low transportation costs and generally take advantage by riding transit more than other areas in the County.

White residents are the most widely dispersed among the racial or ethnic groups, but they do tend to live in areas with greater access to opportunity, such as low poverty areas, neighborhoods with higher performing schools, and, in some areas, better environmental health. Asian residents, along with native Chinese residents, are more highly concentrated in eastern LA County, and to the south, along the Orange County border, areas largely with higher opportunity index values than neighborhoods more centrally located.

Families with children, although somewhat evenly scattered across the service area, are clustered most densely to the south of Downtown Los Angeles and near Long Beach. These neighborhoods typically scored the low on school proficiency, labor market engagement, and environmental health, but higher on transit use and transit cost. The also include the largest collection of R/ECAP Census tracts of anywhere else in the service area (see Map IV.39 on page 126).

ADDITIONAL INFORMATION

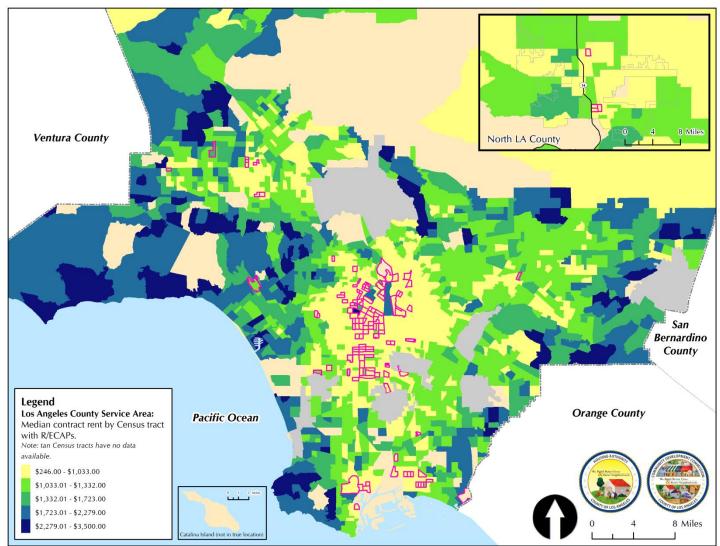
Regarding access to opportunity, two additional factors in the service area are considered here: the median contract rent for rental housing units and median home value. Higher rents pose a problem of affordability and may prohibit low-income residents from living in these housing units. Neighborhoods with high home values are likely to also be unaffordable, as they may have exclusionary zoning practices that prohibit multifamily, low-income housing to be developed there.

Regarding rents, as shown below in Map IV.111, the lowest rents are most commonly found near Downtown Los Angeles, East Los Angeles, and in South Central Los Angeles. These areas correlate very closely with R/ECAP Census tracts. Northern LA County, around the cities of Lancaster and Palmdale, also has low rents. Small pockets near San Fernando and near Long Beach have low rents as well. The rent gradient increases as one moves away from Central LA County, with the highest rents being located at the east and west perimeters of the county, as well as to the south in Rancho Palos Verdes and Palos Verdes Estates.

The median home values in the service area, shown in Map IV.112 on page 233, looks very similar to the map below and shows a very strong correlation with median rent. The lowest home values are in the Downtown and South Central Los Angeles neighborhoods, but there are many areas in the eastern portion of the county with low median home values as well. Neighborhoods with the highest home values can be found near Pasadena, San Marino, West Hollywood, Beverly Hills, and Rancho Palos Verdes, and near Malibu.

Map IV.111
Service Area Median Contract Rent
Los Angeles County Service Area

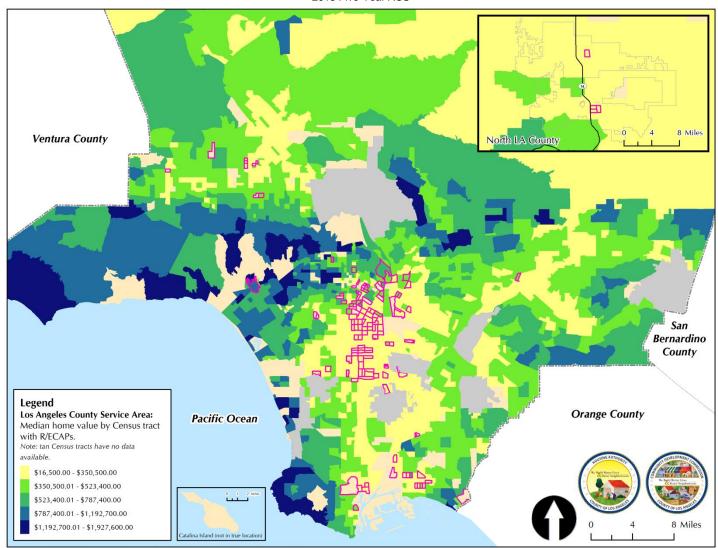
2015 Five-Year ACS



Data Sources: HUD AFFH, County of Los Angeles, 2015 Five-Year ACS, Census Tigerline, Esri

Map IV.112 Service Area Median Home Value Los Angeles County Service Area

2015 Five-Year ACS



Data Sources: HUD AFFH, County of Los Angeles, 2015 Five-Year ACS, Census Tigerline, Esri

Finally, it is worth noting that the affordable housing report mentioned in the Displacement Patterns discussion in the Contributing Factors to Segregation section (see page 124) quantifies the degree to which job proximity and affordable housing are related. Borrowing from a 2016 white paper on the subject, the report describes a low wage jobs-housing "fit" that analyzes the extent to which housing options in a jurisdiction are affordable to its low-wage workforce.⁵⁹ Neighborhoods with lower ratios of low-wage jobs to affordable housing (up to 2:1) are considered to have a relatively good fit, but if a location is found to have a high ratio, its low-wage workforce is likely forced to commute long distances and spend a disproportionately high share of its income on transportation.⁶⁰

The report found that the bulk of the County's affordable housing stock can be found in areas with good jobs-housing fit, meaning that many residents in affordable housing likely do not have to travel long distances to work or spend an inordinate amount of income on transportation. The report recommends focused investment into remaining areas within the County with poor fit ratios, so as not to contribute to further patterns of exclusion and segregation and aid the low-income workforce in affording housing proximate to their centers of employment.⁶¹

OTHER FACTORS CONTRIBUTING TO DISPARITIES IN ACCESS TO OPPORTUNITY

Access to Financial Services

Home Mortgage Disclosure Act Data

To assess the ability of state residents to purchase a home, and to ascertain whether that ability differs by protected class status, the 2017 Assessment of Fair Housing includes a review of home lending data gathered under the Home Mortgage Disclosure Act (HMDA). These data provide a comprehensive portrait of home loan activity, including information pertaining to home purchase loans, home improvement loans, and refinancing, allowing for an analysis of patterns in home lending.

Congress enacted the Home Mortgage Disclosure Act in 1975, permanently authorizing the law in 1988.⁶² The Act requires both depository and non-depository lenders to collect and publicly disclose information about housing-related applications and loans. Under the HMDA, financial institutions are required to report the race, ethnicity, sex, loan amount, and income of mortgage applicants and borrowers by Census tract. Institutions must meet a set of reporting criteria. For depository institutions, these are as follows:

- The institution must be a bank, credit union, or savings association;
- the total assets must exceed the coverage threshold;⁶³

⁵⁹ Chris Benner & Alex Karner (2016): Low-wage jobs-housing fit: identifying locations of affordable housing shortages, Urban Geography, 37:6, 883-903.

 $^{^{60}\} http://1p08d91kd0c03rlxhmhtydpr.wpengine.netdna-cdn.com/wp-content/uploads/2017/05/FinalOutcomesReport.pdf.$

⁶¹ Ihid

⁶² Prior to that year, the law had to periodically reauthorized by Congress.

⁶³ Each December, the Federal Reserve announces the threshold for the following year. The asset threshold may change from year to year based on changes in the Consumer Price Index for Urban Wage Earners and Clerical Workers.

- the institution must have had a home or branch office in a Metropolitan Statistical Area (MSA);
- the institution must have originated or refinanced at least one home purchase loan secured by a first lien on a one- to four-family dwelling;
- the institution must be federally insured or regulated; and
- the mortgage loan must have been insured, guaranteed, or supplemented by a federal agency or intended for sale to Fannie Mae or Freddie Mac.

For other institutions, including non-depository institutions, the reporting criteria are:

- The institution must be a for-profit organization;
- the institution's home purchase loan originations must equal or exceed 10 percent of the institution's total loan originations, or more than \$25 million;
- the institution must have had a home or branch office in an MSA or have received applications for, originated, or purchased five or more home purchase loans, home improvement loans, or refinancing on property located in an MSA in the preceding calendar year; and
- the institution must have assets exceeding \$10 million or have originated 100 or more home purchases in the preceding calendar year.

In addition to reporting race and ethnicity data for loan applicants, the HMDA reporting requirements were modified in response to the Predatory Lending Consumer Protection Act of 2002 as well as the Home Owner Equity Protection Act (HOEPA). Consequently, loan originations are now flagged in the data system for three additional attributes:

- If they are HOEPA loans;
- lien status, such as whether secured by a first lien, a subordinate lien, not secured by a lien, or not applicable (purchased loans); and
- presence of high-annual percentage rate loans (HALs), defined as more than three
 percentage points for purchases when contrasted with comparable treasury instruments
 or five percentage points for refinance loans.

The following discussion will focus on trends in home lending from 2008 through 2015, the most current year for which HMDA data are available.

Service Area HMDA Analysis

Lending institutions handled a total of 2,732,140 loans and loan applications in the service area from 2008 through 2015, as shown below in Table IV.57. Approximately 29.3 percent of these loans or loan applications were intended to finance the purchase of a home, while just over 67 percent of them were intended to refinance.

Table IV.57 Purpose of Loan by Year

Los Angeles County Service Area 2008–2015 HMDA Data

Purpose	2008	2009	2010	2011	2012	2013	2014	2015	Total
Home Purchase	122,888	135,280	118,553	113,444	110,087	106,018	93,222	100,713	799,492
Home Improvement	25,194	14,666	9,990	11,982	11,752	12,639	13,436	17,598	99,659
Refinancing	211,571	264,105	259,808	264,107	373,490	299,140	160,768	231,311	1,832,989
Total	359,653	414,051	388,351	389,533	495,329	417,797	267,426	349,622	2,732,140

About 87 percent of all applications in the service area were owner-occupied loan applications from 2008 to 2015, with this number peaking in 2009 at 122,128 applications. As shown below in Table IV.58, the total number of loan applications has decreased steadily since 2009, but have risen roughly 8 percent from 2014 to 2015.

Table IV.58
Occupancy Status for Home Purchase Loan Applications

Los Angeles County Service Area 2008–2015 HMDA Data

Status	2008	2009	2010	2011	2012	2013	2014	2015	Total
Owner-Occupied	107,583	122,128	106,324	98,864	94,085	89,906	78,690	86,178	697,580
Not Owner-Occupied	12,143	11,866	10,668	13,561	14,174	13,703	12,261	12,213	88,376
Not Applicable	3,162	1,286	1,561	1,019	1,828	2,409	2,271	2,322	13,536
Total	122,888	135,280	118,553	113,444	110,087	106,018	93,222	100,713	799,492

Nearly 320,000 owner-occupied home purchase loan applications in the service area led to successful loan originations, as shown below in Table IV.59. Over 80,000 applications were denied, leading to a service area denial rate of 19.4 percent from 2008 to 2015.

Table IV.59
Loan Applications by Action Taken

Los Angeles County Service Area 2008–2015 HMDA Data

Action	2008	2009	2010	2011	2012	2013	2014	2015	Total
Loan Originated	42,552	49,241	48,877	43,634	45,980	46,081	43,358	47,683	319,723
Application Approved but not Accepted	9,706	6,559	5,800	5,453	4,779	4,370	3,205	2,930	39,872
Application Denied	18,078	12,998	11,462	10,112	10,164	10,122	8,016	7,614	80,952
Application Withdrawn by Applicant	10,338	9,856	8,721	7,681	7,729	7,750	7,731	9,225	59,806
File Closed for Incompleteness	3,117	2,607	2,182	2,288	1,691	1,861	1,591	2,004	15,337
Loan Purchased by the Institution	23,782	40,488	29,274	29,688	23,736	19,696	14,763	16,695	181,427
Preapproval Request Denied	10	379	7	8	6	23	25	5	458
Preapproval Approved but not Accepted	0	0	1	0	0	3	1	22	5
Total	107,583	122,128	106,324	98,864	94,085	89,906	78,690	86,178	697,580
Denial Rate	29.8%	20.9%	19.0%	18.8%	18.1%	18.0%	15.6%	13.8%	19.4%

As seen in Diagram IV.3 below, denial rates have been steadily declining since their peak in 2008.

Diagram IV.3 Denial Rates by Year Los Angeles County Service Area

os Angeles County Service Are 2008–2015 HMDA Data

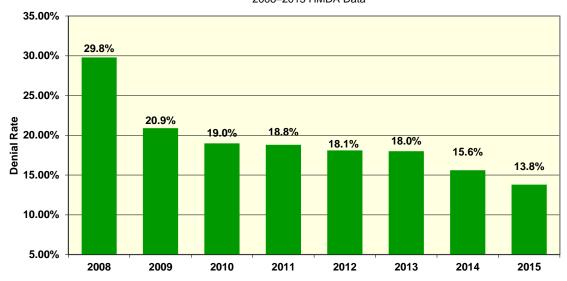


Table IV.60, below, shows reason for denial of loan applications. As seen there, the top reason for denial in the service area from 2008 to 2015 was debt-to-income ratio, with nearly a quarter of all denials being for this reason alone. Only in 2014 was this not the top reason for application denial – then, the "Missing" denial reason held the top spot.

Table IV.60 Loan Applications by Reason for Denial

Los Angeles County Service Area 2008–2015 HMDA Data

Denial Reason	2008	2009	2010	2011	2012	2013	2014	2015	Total
Debt-to-Income Ratio	3,925	3,418	2,862	2,561	2,433	2,523	2,036	1,977	19,758
Employment History	272	218	188	230	195	179	143	113	1,425
Credit History	1,496	1,147	1,072	1,074	1,094	1,037	798	607	7,718
Collateral	2,275	2,229	2,102	1,380	1,370	1,385	905	1,002	11,646
Insufficient Cash	569	327	246	219	256	367	240	270	2,224
Unverifiable Information	1,927	923	655	795	464	441	360	358	5,565
Credit Application Incomplete	2,036	988	1,002	1,089	1,194	1,218	766	717	8,293
Mortgage Insurance Denied	185	117	48	38	22	14	6	8	430
Other	3,009	1,755	1,685	1,070	1,063	972	629	580	10,183
Missing	2,384	1,876	1,602	1,656	2,073	1,986	2,133	0	13,710
Total	18,078	12,998	11,462	10,112	10,164	10,122	8,016	7,614	80,952

Table IV.61, below, shows denial rates in the service area for 2008 through 2015 by race and ethnicity. As seen in the table, American Indian and Hispanic residents experienced denial rates nearly 4 percentage points higher than average during that time period, while Black residents' applications were denied 7.5 percentage points higher than the service area average. However, denial rates among Black residents have been steadily declining since 2008, when the peak of the denial rates was just over 40 percent. Asians have historically been turned down the lowest of all the racial and ethnic groups, except for in 2012 and 2015, when White residents experienced slightly lower denial rates. Non-Hispanic residents experienced lower denial rates than their Hispanic counterparts in every year shown in the table below, but the

gap has been shrinking somewhat from its largest disparity in 2008 of over 10 percentage points.

Table IV.61
Denial Rates by Race/Ethnicity of Applicant

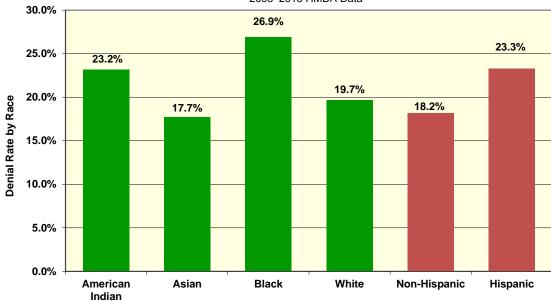
Los Angeles County Service Area 2004–2015 HMDA Data

Race/Ethnicity	2008	2009	2010	2011	2012	2013	2014	2015	Average
American Indian	30.4%	20.1%	21.3%	19.7%	21.8%	22.9%	19.5%	15.8%	23.2%
Asian	23.2%	18.8%	15.1%	17.9%	17.8%	16.8%	14.4%	13.4%	17.7%
Black	40.3%	26.4%	25.0%	25.1%	22.5%	25.5%	20.5%	20.3%	26.9%
White	29.8%	20.4%	19.1%	18.0%	17.4%	17.4%	15.0%	12.8%	19.7%
Not Available	34.2%	24.8%	21.9%	21.9%	20.5%	20.3%	18.6%	17.2%	23.6%
Not Applicable	6.7%	0.0%	04.8%	6.1%	3.7%	8.6%	5.5%	7.0%	5.6%
Average	29.8%	20.9%	19.0%	18.8%	18.1%	18.0%	15.6%	13.8%	19.4%
Non-Hispanic	26.1%	18.5%	16.6%	17.6%	17.1%	16.5%	14.6%	13.0%	18.2%
Hispanic	36.3%	24.3%	22.9%	20.1%	19.5%	21.0%	16.9%	14.4%	23.3%

Diagram IV.4 below shows average denial rates by race/ethnicity from 2008 to 2015. As seen here, Asian and White residents have experienced significantly lower denial rates over the time period covered than have Hispanic, Black, or American Indian residents.



2008–2015 HMDA Data



Denial rates by gender, as shown in Table IV.62 below, reveals that these rates have historically been slightly higher for female applicants than for males. While denial rates for both males and females have been trending down since 2008, female rates have remained roughly one to two percentage points higher than males. 2014 saw the smallest gap between the two groups, with the female denial rate being less than one percentage point higher than the male denial rate.

Table IV.62 Denial Rates by Gender of Applicant

Los Angeles County Service Area 2008–2015 HMDA Data

Year	Male	Female	Not Available	Not Applicable	Average
2008	28.6%	31.3%	35.4%	11.3%	29.8%
2009	20.1%	21.8%	26.2%	4.1%	20.9%
2010	18.5%	19.5%	22.3%	8.7%	19.0%
2011	18.2%	19.9%	20.3%	4.2%	18.8%
2012	17.5%	19.1%	19.4%	5.8%	18.1%
2013	17.3%	19.2%	20.8%	8.5%	18.0%
2014	15.2%	15.9%	19.0%	5.6%	15.6%
2015	13.2%	14.4%	16.8%	6.5%	13.8%
Average	19.5%	21.2%	23.6%	6.9%	19.4%

Income's inverse relationship to the service area denial rate is extremely evident, as shown in Table IV.63 below: lower incomes correspond strongly to higher denial rates. Data for the lowest income category (\$15,000 or Below) show a significant decrease after 2008, but the numbers have picked up to their levels in 2008, hovering around 80 percent again. Rates in the next-lowest income category have followed a similar trajectory, although with correspondingly lower denial rates. Higher income categories also dropped sharply after 2008 but have either remained low or steadily declined since 2009.

Table IV.63
Denial Rates by Income of Applicant

Los Angeles County Service Area 2008–2015 HMDA Data

Income	2008	2009	2010	2011	2012	2013	2014	2015	Total
\$15,000 or Below	80.6%	50.7%	58.3%	60.8%	74.1%	82.7%	76.9%	81.0%	66.6%
\$15,001-\$30,000	50.6%	29.4%	35.0%	31.6%	33.3%	42.7%	40.8%	44.4%	35.5%
\$30,001-\$45,000	34.4%	24.4%	25.0%	23.3%	24.0%	26.7%	26.3%	24.2%	25.5%
\$45,001-\$60,000	29.7%	22.0%	21.8%	19.9%	19.1%	21.8%	20.0%	17.8%	21.5%
\$60,001-\$75,000	28.0%	19.9%	17.9%	17.4%	16.8%	18.5%	15.7%	13.6%	18.6%
Above \$75,000	29.1%	19.1%	15.9%	16.6%	15.4%	14.8%	13.5%	12.0%	17.3%
Data Missing	46.7%	38.6%	32.3%	28.5%	29.6%	26.4%	21.3%	23.2%	29.5%
Total	29.8%	20.9%	19.0%	18.8%	18.1%	18.0%	15.6%	13.8%	19.4%

Asian residents in the service area experienced the highest denial rates for the lowest income category yet the lowest denial rates for the highest income category, as shown below in Table IV.64. Non-Hispanic denial rates for low income categories have actually been higher than have rates for Hispanic residents in those same income categories. But beginning with Income Level \$30K - \$45K, Hispanics see a higher denial rate by an increasingly greater margin. Black denial rates for the highest income category were much greater than any other racial or ethnic group with that income level – the largest such discrepancy for any income level.

Table IV.64
Denial Rates of Loans by Race/Ethnicity and Income of Applicant

Los Angeles County Service Area 2008–2015 HMDA Data

Race	<= \$15K	\$15K-\$30K	\$30K-\$45K	\$45K-\$60K	\$60K-\$75K	Above \$75K	Data Missing	Average
American Indian	75.0%	39.8%	22.0%	20.7%	24.3%	20.5%	34.2%	23.2%
Asian	82.2%	38.1%	22.9%	18.0%	16.4%	15.6%	22.8%	17.7%
Black	65.9%	42.0%	29.4%	25.4%	24.4%	24.9%	47.7%	26.9%
White	61.2%	32.5%	24.4%	21.0%	17.9%	16.8%	34.3%	19.7%
Not Available	75.3%	51.3%	35.5%	28.0%	23.1%	19.5%	48.5%	23.6%
Not Applicable	.0%	.0%	50.0%	33.3%	.0%	11.4%	5.0%	5.6%
Average	66.6%	35.5%	25.5%	21.5%	18.6%	17.3%	29.5%	19.4%
Non-Hispanic	73.1%	36.4%	24.2%	19.6%	17.0%	16.1%	27.3%	18.2%
Hispanic	54.7%	33.1%	25.2%	22.1%	19.9%	20.6%	37.5%	23.3%

HAL rates⁶⁴ were highest in the service area in 2008, but have since dropped dramatically. The rates have remained fairly stable following a large drop after 2009, consistently hovering below 1 percent (see Diagram IV.5 below for HAL rates by year).

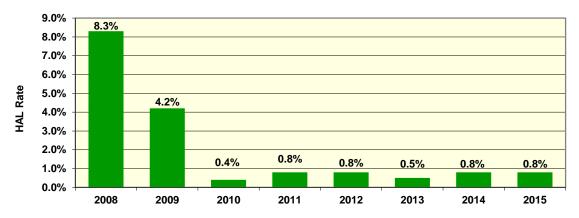
Table IV.65
Originated Owner-Occupied Loans by HAL Status

Los Angeles County Service Area 2008–2015 HMDA Data

Loan Type	2008	2009	2010	2011	2012	2013	2014	2015	Total
Other	39,037	47,151	48,660	43,299	45,602	45,834	43,005	47,295	312,588
HAL	3,515	2,090	217	335	378	247	353	388	7,135
Total	42,552	49,241	48,877	43,634	45,980	46,081	43,358	47,683	319,723
Percent HAL	8.3%	4.2%	.4%	.8%	.8%	.5%	.8%	.8%	2.2%

Diagram IV.5 HAL Rates by Year

Los Angeles County Service Area 2008–2015 HMDA Data



On average, loans issued to American Indians from 2008 to 2015 were slightly higher than other racial and ethnic groups at 4.2 percent. As shown below in Table IV.66, Hispanic and Black residents were issued HAL loans at rates of 3.7 and 3.5 percent, respectively.

⁶⁴ High-annual percentage rate loans (HALs) are defined as loans either greater than three percentage points for purchases or greater than five percentage points for refinance loans when contrasted with comparable treasury instruments.

Table IV.66
Rate of HALs Originated by Race/Ethnicity of Borrower

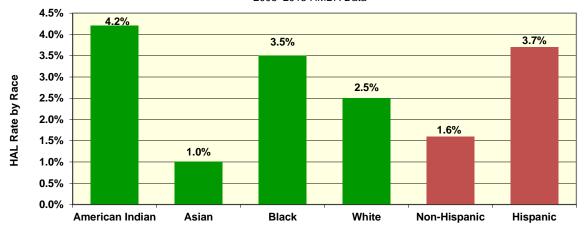
Los Angeles County Service Area 2008–2015 HMDA Data

Race	2008	2009	2010	2011	2012	2013	2014	2015	Average
American Indian	10.6%	6.3%	.4%	.3%	.6%	.7%	2.0%	.7%	4.2%
Asian	4.0%	2.0%	.2%	.3%	.3%	.2%	.5%	.5%	1.0%
Black	12.4%	6.3%	.2%	.7%	2.1%	1.6%	1.6%	.9%	3.5%
White	9.7%	4.8%	.5%	.7%	.8%	.5%	.7%	.9%	2.5%
Not Available	6.0%	3.8%	.7%	1.5%	1.4%	1.0%	1.5%	1.0%	2.3%
Not Applicable	.0%	2.2%	.0%	.0%	.0%	1.0%	.0%	.0%	.5%
Average	8.3%	4.2%	.4%	.8%	.8%	.5%	.8%	.8%	2.2%
Non-Hispanic	6.0%	3.1%	.4%	.5%	.5%	.4%	.6%	.6%	1.6%
Hispanic	14.9%	7.1%	.5%	1.1%	1.4%	.9%	1.3%	1.3%	3.7%

Diagram IV.6 below shows average HAL rates by race and ethnicity. Clearly, Asian and all non-Hispanic residents were issued HALs at a much lower rate than other racial or ethnic groups.

Diagram IV.6 HAL Rates by Race/Ethnicity

Los Angeles County Service Area 2008–2015 HMDA Data



Besides 2012 and 2013, HAL rates were higher in the low-income category of \$15k or Below, with the rate being nearly double the next-lowest income categories in 2015. On average, the HAL rate in the lowest income category was nearly two percentage points higher than the 15k – 30k income category. For more HMDA data tables, see Technical Appendix Section II.

Table IV.67
Rates of HALs by Income of Borrower

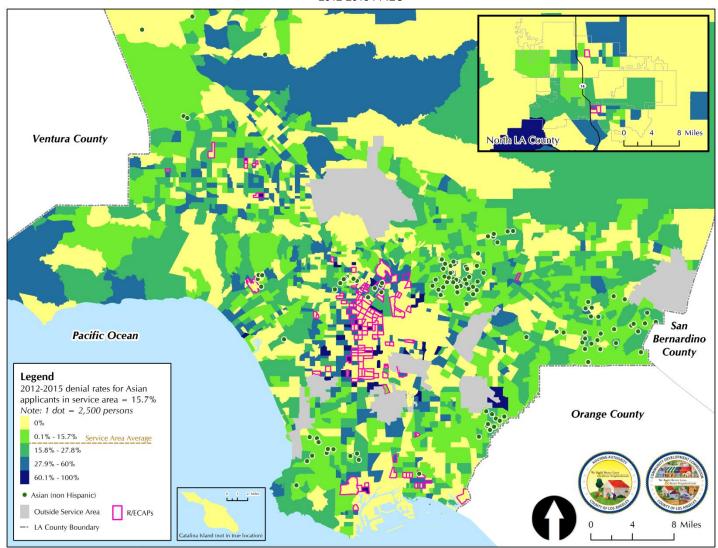
Los Angeles County Service Area 2008–2015 HMDA Data

Income	2008	2009	2010	2011	2012	2013	2014	2015	Average
\$15,000 or Below	5.0%	11.1%	2.0%	2.1%	.0%	.0%	11.1%	9.1%	5.8%
\$15,001-\$30,000	19.3%	8.3%	.5%	1.4%	1.6%	.9%	3.3%	4.5%	4.0%
\$30,001-\$45,000	16.1%	6.8%	.7%	1.5%	1.6%	1.6%	3.8%	4.3%	3.7%
\$45,001 -\$60,000	11.2%	5.4%	.8%	1.3%	1.6%	1.1%	1.9%	1.9%	2.9%
\$60,001-\$75,000	9.0%	4.6%	.5%	1.1%	1.2%	.8%	1.1%	1.3%	2.4%
Above \$75,000	6.9%	3.1%	.3%	.3%	.3%	.3%	.4%	.4%	1.5%
Data Missing	18.8%	4.7%	.1%	.7%	.9%	.7%	1.0%	2.1%	2.3%
Average	8.3%	4.2%	.4%	.8%	.8%	.5%	.8%	.8%	2.2%

The following four maps show denial rates from 2012 through 2015 for Asian, Black, Hispanic, and White residents, along with dot densities for the respective populations. The four maps beginning with Map IV.117 on page 247 show percentage of loans that are HALs, indicating possible locations of high instances of predatory lending practices. As shown there, the neighborhoods with the largest rates of HAL loans for Asian residents are in eastern LA County, where there are large clusters of Asian residents. Black HAL rates are clustered most around Compton, and Hispanic HAL rates are high near San Fernando and south of Compton. Tracts near Lancaster and Palmdale also have higher rates of HALs near Hispanic populations. Tracts with medium to high levels of HAL rates for White residents are spread fairly evenly around the County, with extremely high rates being located in the south and east of the County, however these areas are not home to large clusters of White residents.

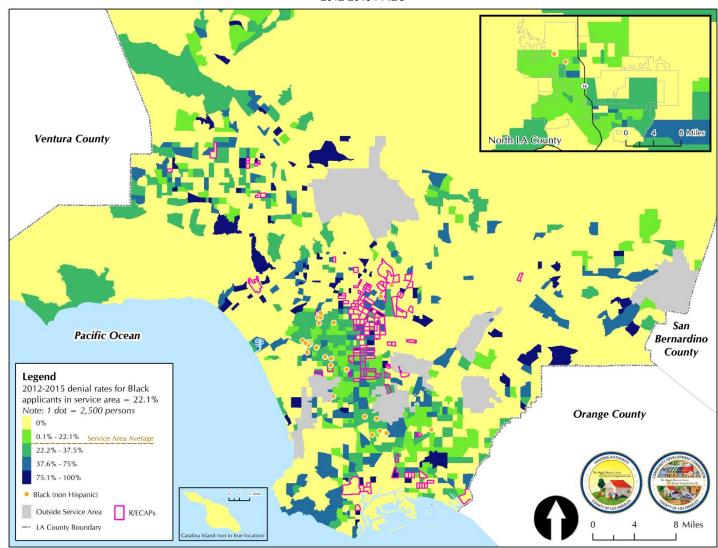
Map IV.113
Denial Rates: Asian Residents

Los Angeles County Service Area 2012-2015 FFIEC

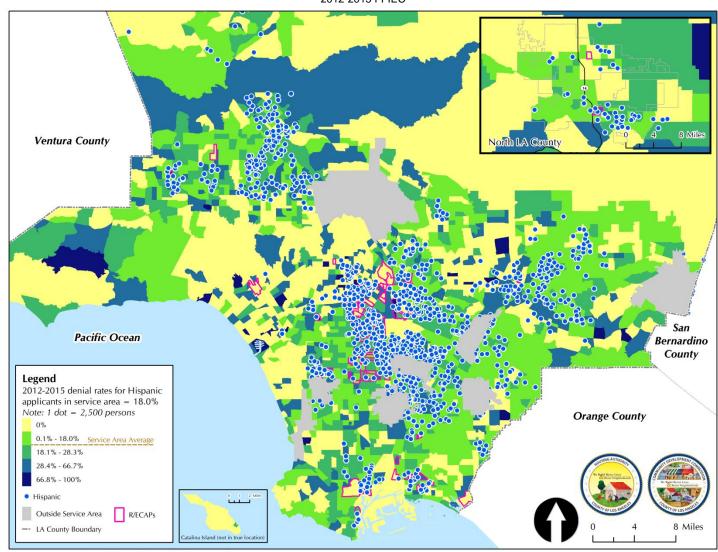


Map IV.114
Denial Rates: Black Residents

Los Angeles County Service Area 2012-2015 FFIEC

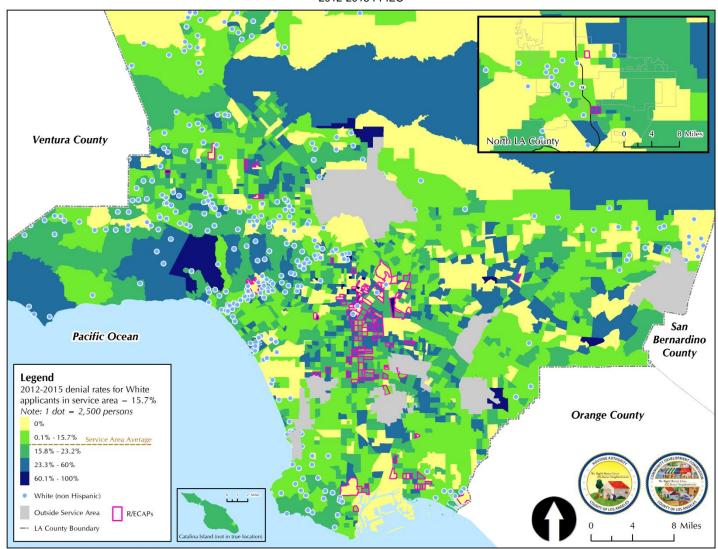


Map IV.115
Denial Rates: Hispanic Residents
Los Angeles County Service Area
2012-2015 FFIEC



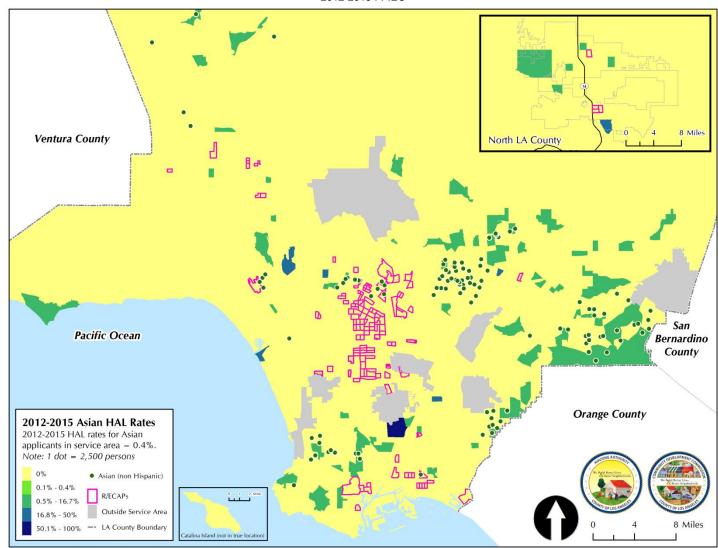
Map IV.116
Denial Rates: White Residents

Los Angeles County Service Area 2012-2015 FFIEC



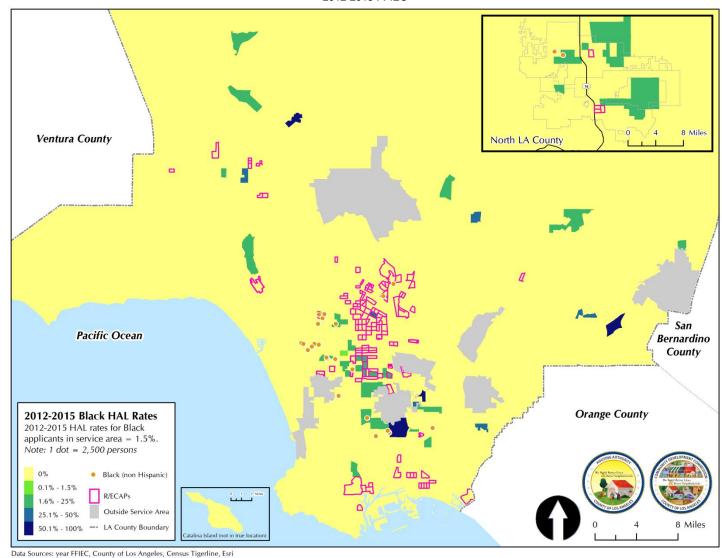
Map IV.117 Predatory Lending (HAL rates) for Asian Residents
Los Angeles County Service Area

2012-2015 FFIEC

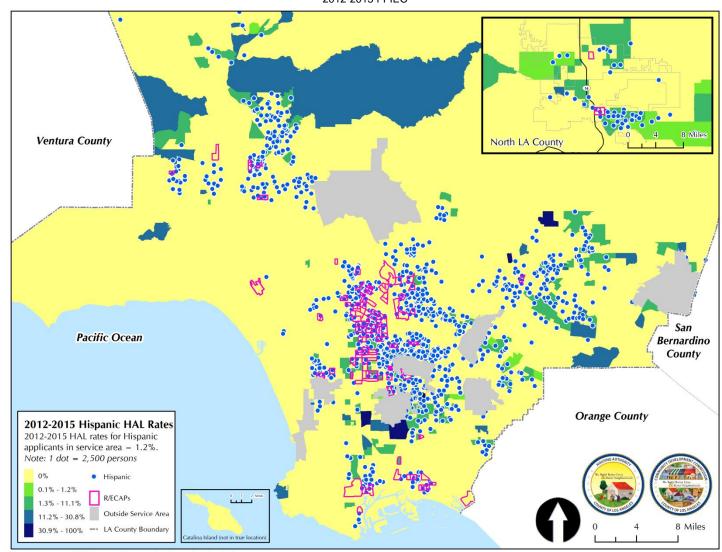


Map IV.118 Predatory Lending (HAL rates) for Black Residents
Los Angeles County Service Area

2012-2015 FFIEC

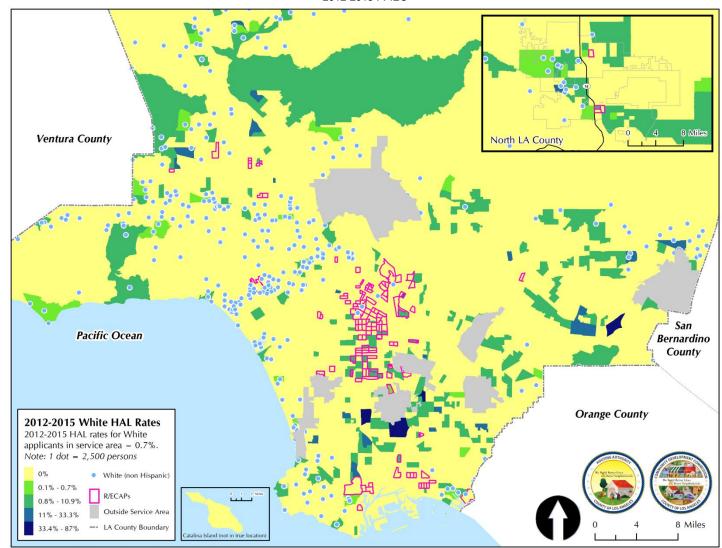


Map IV.119 Predatory Lending (HAL rates) for Hispanic Residents
Los Angeles County Service Area
2012-2015 FFIEC



Map IV.120 Predatory Lending (HAL rates) for White Residents
Los Angeles County Service Area

2012-2015 FFIEC



Summary

Denial rates among female applicants tended to be slightly higher than their male counterparts (see Table IV.62 on page 239), while denial rates among low income residents were higher than among those with larger incomes (see Table IV.63 on page 239).

As shown in the above maps, the highest denial rates among Asian residents are not geographically isolated to any particular neighborhood, while denial rates among Black residents followed a more observable pattern. South of Downtown Los Angeles, denial rates for Black residents was shown to be consistently higher than elsewhere in the County, but the higher rates didn't align much with R/ECAP areas (see Map IV.114 above). Denial rates for Hispanic denial were highest in central Los Angeles County, near many of the R/ECAP areas close to Downtown LA, as well as to the north near San Fernando.

The higher denial rates in and around R/ECAP areas seem indicate that residents in these neighborhood do not have the same access to financial lending services as to residents living in more affluent areas of the service area. This contributes to the disparities in access to opportunity by not allowing residents in R/ECAP Census tracts to borrow capital for purchase or improvement of a home. Furthermore, higher HAL rates among Hispanic and Black residents indicate these groups do not have access to financial institutions at the same level as others, falling prey to predatory lending at a greater frequency.

Service Area CRA Analysis

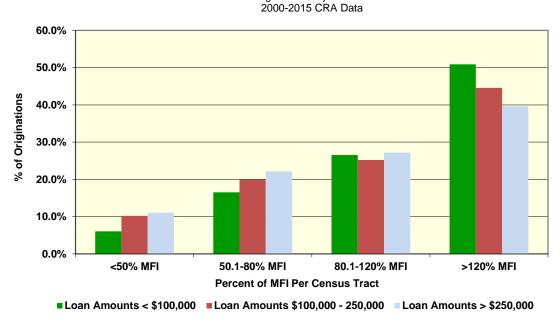
Another factor to consider when assessing access to opportunity within a neighborhood is the degree to which that neighborhood is flourishing economically. Economic vitality can partly be measured through Community Reinvestment Act (CRA) data. According to these data, 4,370,321 small business loans were extended to businesses in the service area from 2000 to 2015. Of these, 1,755,848 loans were given to businesses with annual revenues of less than \$1 million. Tables with complete CRA data are presented in Technical Appendix Section III.

Diagram IV.7 below presents the distribution of small business loans by value and income level of the Census tract in which the loan was issued. Roughly 20 percent of small business loans were issued in Census tracts where the median family income ranged from 50.1 to 80 percent of the service area median family income. Over 50 percent of the smallest loan amounts were issued to small businesses in Census tracts with the highest MFI (over 120 percent of MFI), and roughly 45 percent of all loans were issued in these Census tracts. Only around one-quarter of loans issued went to businesses in Census tracts with 80.1 to 120 percent of the service area MFI. The lowest-income Census tracts accounted for only about ten percent of all small business loans issued between 2000 and 2015.

From 2012 to 2015, the median dollar value of small business loans per Census tract in the service area was \$5,963,500, while the median number of small business loans per Census tract in the service area was 262. Beginning with Map IV.121 on page 253, loan amounts and number of loans are mapped throughout the service area for the time period spanning 2000 to 2011 and 2012 to 2015. As seen there, Census tracts receiving loans with higher dollar values were mainly located outside of Downtown and Central Los Angeles, with the highest amounts occurring in East Los Angeles and to the west near Beverly Hills. The number of small business

loans was also generally higher in these Census tracts, as well as in much of West Los Angeles County (see Map IV.123 and Map IV.124, beginning on page 255).

Diagram IV.7
Percent of Small Business Loans Originated by Census Tract MFI
Los Angeles County Service Area

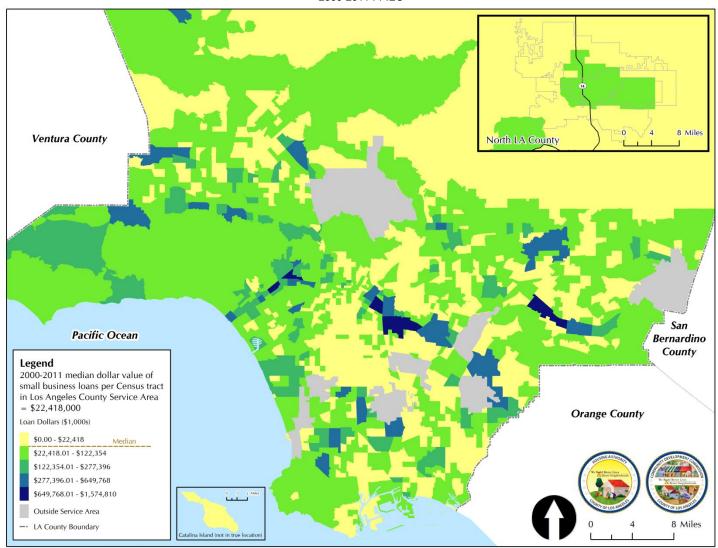


Summary

Most historical small business loans of all amounts have gone to Census tracts with greater than 120 percent of the service area median family income, as seen above in Diagram IV.7. Census tracts in east Los Angeles County near Industry and Baldwin Park have received the largest number of small business loans since 2000, and also the highest dollar amount of loans since that time.

Map IV.121 2000-2011 Loan Amounts to Small Businesses

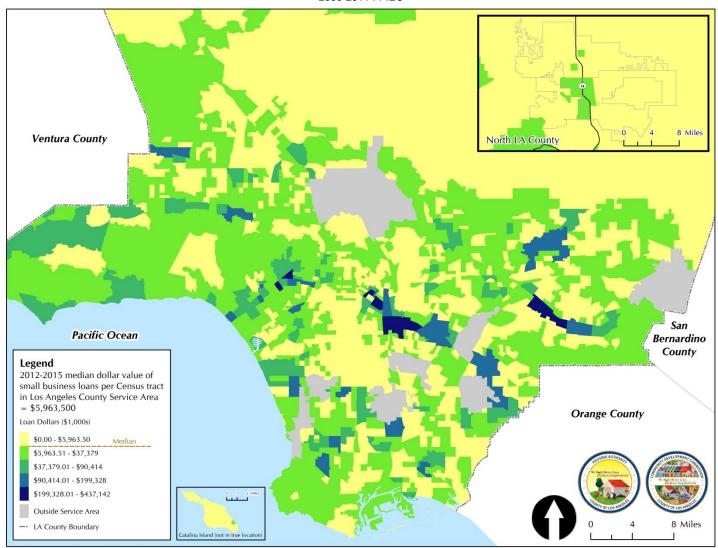
Los Angeles County Service Area 2000-2011 FFIEC



Data Sources: 2000-2011 FFIEC, County of Los Angeles, Census Tigerline Esri

Map IV.122 2012-2015 Loan Amounts to Small Businesses

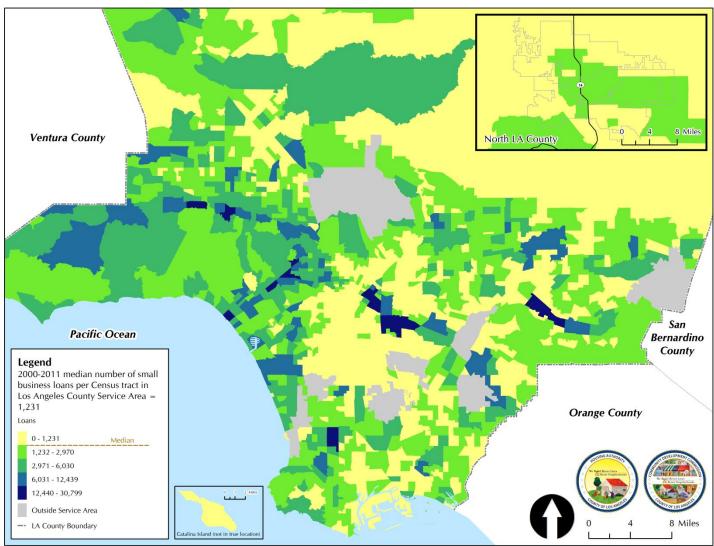
Los Angeles County Service Area 2000-2011 FFIEC



Data Sources: 2012-2015 FFIEC, County of Los Angeles, Census Tigerline Esri

Map IV.123 2000-2011 Small Business Loans Los Angeles County Service Area

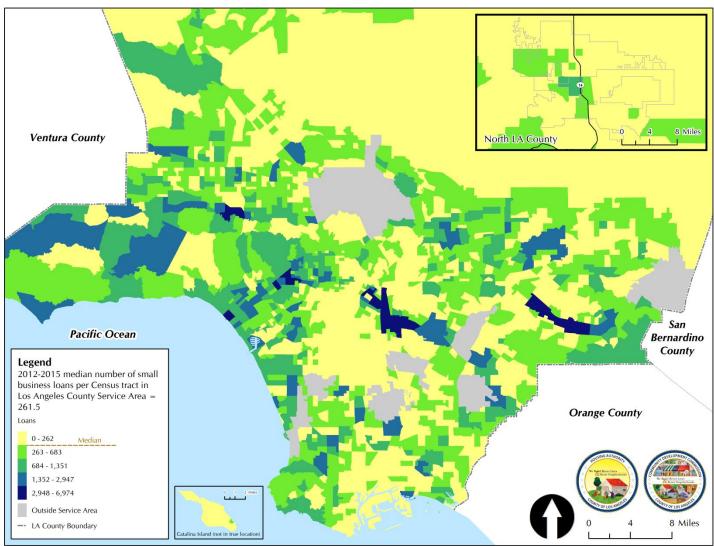
2000-2011 FFIEC



Data Sources: 2000-2011 FFIEC, County of Los Angeles, Census Tigerline Esri

Map IV.124 2012-2015 Small Business Loans

Los Angeles County Service Area 2000-2011 FFIEC



Data Sources: 2012-2015 FFIEC, County of Los Angeles, Census Tigerline Esri

Public Health

Another factor related to disparities in healthy neighborhoods may be related to air quality. National studies found that minorities are on average exposed to higher levels of air pollution than white households, on average over 38 percent higher.⁶⁵ The national study found that, on average, the disparities in exposure by race were more than two times as large as the disparities by income.⁶⁶ South LA and Watts are impacted by higher levels of air pollution than predominately White neighborhoods.⁶⁷ Los Angeles County ranks behind six other large metropolitan areas as having the widest disparity in average exposure between lower-income minority census block groups and upper-income white ones.⁶⁸

CalEnviroScreen

The CalEnviroScreen is a mapping tool that helps identify communities impacted by many sources of pollution.⁶⁹ The tool was developed by the California Environmental Protection Agency and the Office of Environmental Health Hazard Assessment (OEHHA). The tool uses environmental, health, and socioeconomic information to produce scores by census tract, and data is available statewide.

The CalEnviroScreen is scored based on the population burden and the population characteristics. There are four categories of indicators to measure the pollution burden, or health and vulnerability factors. These categories are:

- **Exposure** indicators are based on measurements of different types of pollution that people may come into contact with.
- **Environmental effects** indicators are based on the locations of toxic chemicals in or near communities.
- **Sensitive population** indicators measure the number of people in a community who may be more severely affected by pollution because of their age or health.
- **Socioeconomic factor** indicators are conditions that may increase people's stress or make healthy living difficult and cause them to be more sensitive to pollution's effects.

These are then multiplied by the population characteristics, which include factors such as low birth-weights, asthma emergency department visits, educational attainment, linguistic isolation, poverty and unemployment. A score is determined for these. The pollution burden and the population characteristics each have a maximum score of ten. Once multiplied, the maximum score is 100.

Map IV.125, on the following page, shows the CalEnviroScreen scores for the Los Angeles County Service Area. The highest scores are shown in the darkest red on the map, and any areas in red are in the top 25 percentile range. The areas with the highest scores are found in East and South Los Angeles, as well as some areas in the North Valley region of the City. High scores can also be seen in the area around El Monte and Baldwin Park.

⁶⁵ https://www.washingtonpost.com/news/wonk/wp/2014/04/15/pollution-is-substantially-worse-in-minority-neighborhoods-across-the-us/?utm_term = .b9ca8102cae1 ⁶⁶ lbid.

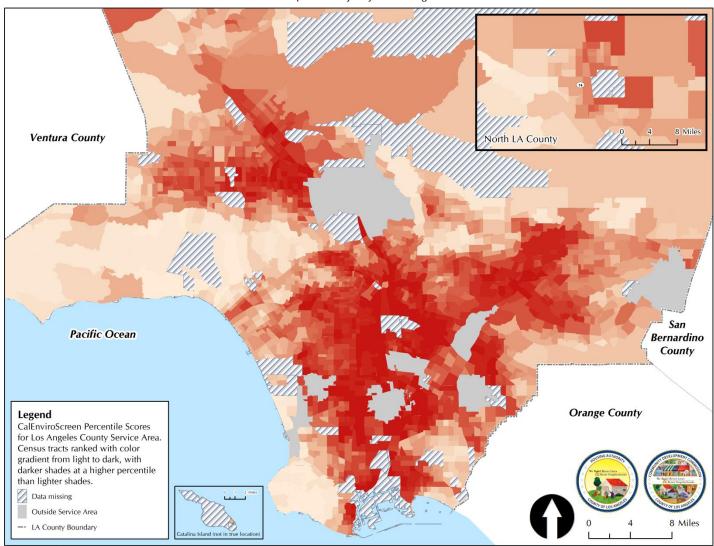
⁶⁷ http://laist.com/2017/02/03/smog regulations.php

⁶⁸ https://www.washingtonpost.com/news/wonk/wp/2014/04/15/pollution-is-substantially-worse-in-minority-neighborhoods-across-the-u-s/?utm_term = .b9ca8102cae1

⁶⁹ http://oehha.ca.gov/calenviroscreen

Map IV.125 Environment Screen

Los Angeles County Service Area Data provided by City of Los Angeles



Data Sources: oehha.gov, County of Los Angeles, Esri

Kaiser Community Health Assessment

In 2013, Kaiser Foundation Hospital released the Community Needs Assessment for Los Angeles. The report identified the following health needs: Mental Health, Obesity/Overweight, Oral Health, Diabetes, Disability, Cardiovascular disease, Hypertension, Cholesterol, alcohol and Substance Abuse, Intentional Injury, Cancer in General, Breast Cancer, Alzheimer's Disease, Asthma, Cervical Cancer, Hepatitis C, HIV/AIDS, Colorectal Cancer, Unintentional Injury, Arthritis, Allergies, Infant Mortality.

The report found that the top five root causes linked to many health problems were employment, income, health insurance, homelessness, and alcohol and substance abuse.

Los Angeles Community Health Improvement Plan

The City of Los Angeles has identified three areas to improve community and individual health, and these priority areas contain factors which may contribute to disparities in access to health neighborhoods in particular.

Priority Area 1: Increase Prevention to Improve Health through preventing and monitoring chronic disease and increasing access to care. The strategies to accomplish these goals include:

- increasing linkage between health care services and community-;level prevention services
- increase access to healthy food
- increase access to opportunities for physical activity
- reduce smoking and exposure to second hand smoke
- Increased access to medical care
- Increased access to mental health care
- Increased access to dental care

Priority Area 2: Create Healthy and Safe Communities through preventing and reducing violence, traffic collisions, exposure to air pollution, exposure to transmission of infection diseases, and to prepare for emerging infections and other threats to public health. The strategies to accomplish these goals include:

- Reduce violence
- Prevent violence
- Prevent and reduce traffic collisions
- Reduce toxic emissions
- Design communities that reduce exposure to air pollution
- Reduce rate of new gonorrhea & HIV cases
- Reduce the rate of new TB cases
- Increase the number of kindergarteners who receive all vaccines required for school entry

⁷⁰ https://share.kaiserpermanente.org/wp-content/uploads/2013/09/Los-Angeles-CHNA 2013.pdf

Priority Area 3: Achieve Equity and Community Stability through increasing the availability of safe, quality affordable housing, increasing the number of youth who graduate high school and pursue higher education, and preventing and treating substance abuse. The strategies to accomplish these goals include:

- Increase availability of affordable housing
- Prevent displacement and homelessness
- Improve the quality of housing

Community Health & Equity Index

The Community Health and Equity Index was developed as a way to evaluate community health across the City and County of Los Angeles. The Index, developed in 2013 by Raimi + Associates, standardizes demographic, socio-economic, health conditions, land use, transportation, food, environment, crime, and pollution burden levels. Each of these variables describes above were weighted based on their indicated role in the community health. These are then averaged together, creating a score from zero to 100. The lower the score, the higher quality of community health is present in that area.

In weighting the variables, the hardship index was given the highest weight of 35 out of 100, and includes demographic, economic, housing and education. Health outcomes, including life expectancy and health variables were weighted at 25, or a quarter of the total. Land use, including a walkability index and a complete community index (diversity of amenities and establishments) comprised 7.5 of 100. Transportation accounted for 7.5, food accounted for 10, crime accounted for 7.5, and the pollution burden index accounted for 7.5. Each community was given a score based on these factors.

The areas with the highest scores are concentrated in South Los Angeles and the Harbor planning area, as well as portions of East Los Angeles. There are also additional areas with poorer community health in the North Valley area. Conversely, some of the areas with the lowest scores, and therefore the better rates of community health, are in West Los Angeles, as well as interspersed in the South Valley.⁷¹

Lead Poisoning

An investigation by Reuters found that around Los Angeles County, over 15,000 children under the age of 6 tested high for lead between 2011 and 2015. 72 Specifically, over 17 percent of small children tested positive for elevated levels of lead in their blood, 73 and these levels were highest in two Cenus tracts in San Marino, among the wealthiest areas in the entire county.⁷⁴ The investigation found that imported food, medicine or pottery from China, and old leadbased paint tend to be the most likely sources of exposure. In the most hazardous areas, old housing abounds: nearly half of the homes in LA County were built prior to 1960, and although lead was banned from household paint starting in 1978, old paint can peel, chip, or

⁷¹ The data was unavailable at the county level, so no map is provided in this analysis.

^{72 &}quot;Lead's Hidden Toll", Joshua Schneyer, April 20, 2017. Reuters Ivestigates. http://www.reuters.com/investigates/special-report/usa-

⁷³ For perspective, during the peak of the Flint (MI) water contamination crisis in 2015, only 5 percent of children tested high for lead. 74 ibid.

pulverize into toxic dust.⁷⁵ According to the report, poverty can also be closely linked to lead exposure, as many areas with high levels are in low-income or gentrifying areas around Downtown Los Angeles.⁷⁶ This quickly becomes an affordable housing issue, as many renters shy away from approaching their landlords to fix problems inherent in lead paint, for fear of being eviction. Lead poisoning in children can lead to serious and irreversible effects, and LA County and the City of LA have dedicated prevention programs that work with at-risk families, giving them resources to detect and deter further exposure.⁷⁷

As shown below in Diagram IV.8, the highest levels of lead exposure can be found in and around San Marino, Rosemead, Arcadia, and Monrovia.⁷⁸

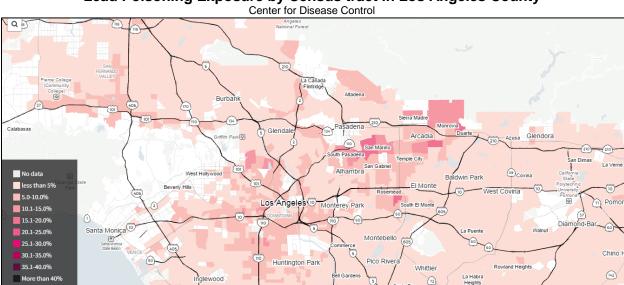


Diagram IV.8
Lead Poisoning Exposure by Census tract in Los Angeles County

Uninsured Populations in LA County

Table IV.68 below shows uninsured populations in Los Angeles County by different demographic slices: age, race/ethnicity (with domestic/foreign born designation), education, and disability status. The data, culled from the LA County 2015 Health Survey, reveals several noteworthy trends in access to health insurance. As far as age cohorts, the most vulnerable appears to be the 25-29 group, with nearly 20 percent of this cohort being uninsured. Among race or ethnicities, the highest population of uninsured residents is in foreign-born Hispanics, with 21.4 not having access to health insurance. Foreign-born White residents and US-born Black residents had among the lowest uninsured rates among the population, with only 5.2 and 5.5 percent, respectively, not having access to health insurance. As far as education attainment, the results are perhaps not surprising, as lower levels of education seem to correlate strongly with greater uninsured rates. This may be due to the fact that residents with higher educational attainment are more likely to be placed in jobs with employer-provided health insurance, but

⁷⁵ ibid.

⁷⁶ ibid.

⁷⁷ ibid.

⁷⁸ Source data unavailable at the county level, so no further maps or tables are included in this analysis.

this is speculative. Similar to education, poverty tends to correlate with uninsured status, although less strongly. While residents living at 0 – 99 percent of the federal poverty level (FPL) do have high uninsured rates, the rate increases by nearly two percentage points in the category of residents living at 100 – 199 percent of the FPL. The uninsured rate drops drastically in the final poverty category, down to 3.4 percent of those living at 300 percent or above the FPL. Finally, only 8.7 percent of those claiming a disability were uninsured, compared to the 12.4 percent of those with no disability.

Table IV.68
Adults (18-64) without Health Insurance
Los Angeles County Department of Public Health

LA County Health Survey, 2015					
Demographic Category	Estimated Percent				
Age Group					
18-24	11.4%				
25-29	18.8%				
30-39	14.8%				
40-49	12.3%				
50-59	6.8%				
60-64	4.1%				
Race/Ethnicity with Foreign/US Bo	0				
Hispanic	17.3%				
Foreign born	21.4%				
US born	10.8%				
White	6.4%				
Foreign born	5.2%				
US born	6.7%				
Black/African American	6.1%				
Foreign born	-				
US born	5.5%				
Asian	7.3%				
Foreign born	7.6%				
US born	6.6%				
Education					
Less than high school	23.2%				
High school	12.4%				
Some college or trade school	8.4%				
College or post graduate	5.1%				
degree					
Federal Poverty Level ⁷⁹	10.00/				
0-99% FPL	16.9%				
100%-199% FPL	18.7%				
200%-299% FPL	12.3%				
300% or above FPL	3.4%				
Disability	0 =0/				
Yes	8.7%				
No	12.4%				

Difficulty in Accessing Medical Care

The 2015 LA County Health Survey also asked respondents to rate the degree of difficulty in obtaining medical care when needed. Those who responded with *somewhat* or *very difficult* to this question are outlined in Table IV.69 below, under the same demographic categories as the uninsured populations in Table IV.68 above. As the data below is related to the data above, it is perhaps unsurprising that many of the trends follow here. That is, demographics with the largest rates of uninsured status correlate very closely with those having greater degrees of difficulty in obtaining medical care. Residents with education levels lower than high school

⁷⁹ Based on U.S. Census 2013 Federal Poverty Level (FPL) thresholds which for a family of four (2 adults, 2 dependents) correspond to annual incomes of \$23,624 (100% FPL), \$47,248 (200% FPL), and \$70,872 (300% FPL). These thresholds were the values at the time of survey interviewing.

and foreign-born Hispanics were among the highest populations with somewhat or very difficult degrees of difficulty in obtaining medical care.

Table IV.69
Adults (18+) with Difficulty in Obtaining Medical Care
Los Angeles County Department of Public Health

LA County Health Survey, 2015

Demographic Category	Estimated Percent
Age Group	
18-24	23.5%
25-29	33.9%
30-39	27.9%
40-49	28.6%
50-59	22.8%
60-64	17.9%
65 and over	9.3%
Race/Ethnicity with Foreign/US Born De	signation
Hispanic	31.2%
Foreign born	39.0%
US born	19.0%
White	12.7%
Foreign born	15.1%
US born	11.9%
Black/African American	19.0%
Foreign born	15.2%
US born	19.4%
Asian	26.8%
Foreign born	31.5%
US born	13.4%
Education	
Less than high school	43.4%
High school	24.9%
Some college or trade school	17.6%
College or post graduate degree	12.8%
Federal Poverty Level ⁶⁰	
0-99% FPL	43.0%
100%-199% FPL	30.9%
200%-299% FPL	18.9%
300% or above FPL	9.0%
Disability	
Yes	25.6%
No	23.0%

Access to Fresh Fruits & Vegetables

The 2015 LA County Health Survey also asked respondents who were parents, guardians, or decision makers over children whether their community had good or excellent access to fresh fruits and vegetables. The results of this question are shown in Table IV.70 below.⁸¹ As shown there, the oldest age cohorts reported having the best access to fresh foods, while the youngest cohorts reported having the lowest access, with nearly 30 percentage points separating the two categories. It should be worth noting, however, that the sample size of adults in the oldest age cohort is likely to be much smaller than respondents who are in the younger cohorts.

⁸⁰ Based on U.S. Census 2013 Federal Poverty Level (FPL) thresholds which for a family of four (2 adults, 2 dependents) correspond to annual incomes of \$23,624 (100% FPL), \$47,248 (200% FPL), and \$70,872 (300% FPL). These thresholds were the values at the time of survey interviewing.

⁸¹ These demographics show the characteristics of the respondent who answered the survey, not that of the child or children in the home.

Of the race or ethnicities, US-born Hispanic and Black residents reported having among the lowest rate of access to fresh foods, while foreign-born Black, US-born Asian, and foreign-born White residents reported having the highest and best access to fresh foods.

As the case with the other public health data presented above, educational attainment appears to be closely correlated with access to healthy foods, with the biggest jump occurring when residents earn a college or post graduate degree: over 11 percentage points separate the *some college or trade school* group from those who have gone on to finish school and earn a degree. A similarly large jump in access to healthy food appears in populations 300 percent or above the FPL from the next category down, with a separation of over 10 percentage points.

Table IV.70
Parent/Guardian/Decision Maker of Children (0-17 years old)
Reporting Good or Excellent Access to Fresh Fruits/Vegetables

Los Angeles County Department of Public Health

LA County Health Survey, 2015

LA County Health Survey, 2015				
Demographic Category	Estimated Percent			
Age Group	50.00/			
18-24	59.9%			
25-29	72.2%			
30-39	72.6%			
40-49	78.7%			
50-59	78.3%			
60-64	79.7%			
65 and over	88.4%			
Race/Ethnicity with Foreign/US Born De	signation			
Hispanic	68.1%			
Foreign born	68.5%			
US born	67.3%			
White	89.8%			
Foreign born	90.8%			
US born	89.7%			
Black/African American	69.8%			
Foreign born	94.1%			
US born	67.1%			
Asian	85.1%			
Foreign born	83.1%			
US born	91.8%			
Education				
Less than high school	68.5%			
High school	67.9%			
Some college or trade school	73.1%			
College or post graduate degree	84.4%			
Federal Poverty Level ⁶²				
0-99% FPĹ	66.4%			
100%-199% FPL	68.2%			
200%-299% FPL	79.2%			
300% or above FPL	89.6%			

Quality of Life Index

UCLA's Luskin School of Public Affairs conducted a second annual Los Angeles County Quality of Life Index (QLI), prepared as a measure of overall life satisfaction regarding a many criteria; the project was conducted in collaboration with the research firm Fairbank, Maslin,

⁸² Based on U.S. Census 2013 Federal Poverty Level (FPL) thresholds which for a family of four (2 adults, 2 dependents) correspond to annual incomes of \$23,624 (100% FPL), \$47,248 (200% FPL), and \$70,872 (300% FPL). These thresholds were the values at the time of survey interviewing.

Maullin, Metz & Associates.⁸³ Published in March of 2017, the report synthesized the data into eight key findings, outlined here:

- 1. Nearly two in five (37%) LA County residents are worried that they or a close friend/family member will be deported from the U.S. because of their immigration status. Not surprisingly this concern is most acute among Latinos (56% say they are worried) but is also more evident among Millennials and younger Angelenos in general;
- 2. By more than a 3 to 1 ratio (48% to 14%), our survey respondents say that their access to quality medical care would be made worse by the Trump/Republican replacement of Obamacare. Younger, lower-income residents (especially women) as well as both Latinos and African-Americans—all likely beneficiaries of Obamacare—are the most negative about its potential replacement. The survey was conducted prior to the decision to withdraw the "repeal and replace" legislation proposed by President Trump and House Speaker Paul Ryan;
- 3. By about 3 to 1 (57% to 17% and 55% to 19% respectively on two separate questions), Los Angeles residents feel that the rising costs of housing and rents for local businesses have had negative impacts on their communities. This gentrification has been especially troubling for lower-income, younger and Latino and African-American residents;
- 4. The overall satisfaction score for life in LA County remains at 59—same as in 2016—a slightly above average result;
- 5. While the overall score remained the same, there was movement among our nine basic categories of life in LA, with one category—transportation/traffic—moving into our bottom tier, and another—race relations—becoming the most positive category of the nine;
- 6. Specifically, race relations, neighborhood quality and health care continue to be rated highest, while transportation/traffic, education, and cost of living are rated most negatively by Los Angeles County residents;
- 7. Last year we found "profound differences between ethnic groups" when it came to economic distress—particularly concerning whether or not residents worry about going hungry or becoming homeless. This year those differences, while still present, became more muted as concern declined about hunger and homelessness, perhaps in part due to the recent economic uptick and also political commitment to address the homelessness issue:
- 8. As a result of these and other findings, including the impact of rising housing costs, we find several places in these results, including the overall satisfaction index, where the youngest Angelenos (18-29 year-olds and 30-39 year-olds) are the most dissatisfied or concerned. The simple but harsh fact about life in LA in 2017 is that those who we would normally expect to be most optimistic about their futures are, instead, most anxious about their economic status, citizenship and health care.⁸⁴

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⁸³ Link to the full report can be found here: https://ucla.app.box.com/s/z5jcik07bw5v10d718mhv14fp3ts9mo0.

⁸⁴ https://ucla.app.box.com/s/z5jcik07bw5v10d718mhv14fp3ts9mo0.

SUMMARY

As a guide to aiding resource investments in the County, the research team developed single composite index representing a rating of Census tracts, which factors in variables concerning education, job and labor markets, housing, transportation, and environmental health. Those areas scoring a high index represent the areas with the greatest opportunity. These are physical places having desirable attributes, such as high-performing schools, availability of well-paying jobs, and clean air quality, among others. Areas with a low index represent areas with low opportunity, and are heavily populated with R/ECAP areas. The index is designed to better understand what an "area of opportunity" represents and what disparities in opportunity mean. Investments can be either place-based or to enhance mobility, but the opportunity index score aids in helping us to better include an evaluation of equity and the distribution and access to opportunity within the larger community. In developing this index, HUD-provided data as well as local data have been incorporated as part of the methodology.

Census tracts were evaluated on the basis of these factors and scored a value between 0 and 100; in LA County, the minimum score was 43.9 (near South Central Los Angeles) and the maximum score was 78.2 (near Malibu). Table IV.71 below shows the factors incorporated in the development of this index.

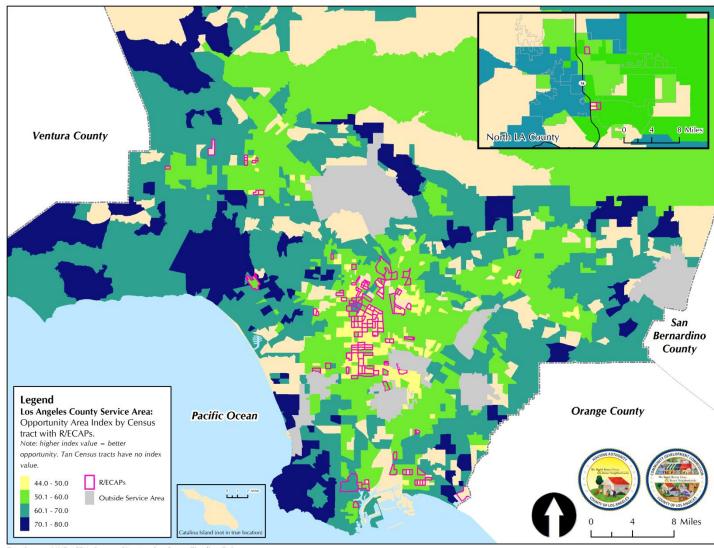
Table IV.71
Factors Considered in Areas of Opportunity
HUD Data, Census Database, Local Data

Education	Economic	Housing Transportation		Health
School Proficiency Index	Job Proximity Index	Percent Occupied Housing Units	Transit Trips Index	Environmental Health Index
Percent of Persons	Labor Market	Percent No Cost	Low Transportation	maox
Enrolled in School	Engagement Index	Burden	Cost Index	
High School Graduation	Employment Rate	Percent No	Percent Walking to	
Rate	Employment reac	Overcrowding	Work	
		Percent Non HAL		
		Loans		

Variables in each of the five categories (Education, Economic, Housing, Transportation, and Health) were given equal weighting. The five categories were then compiled into one "master" opportunity index value, weighted such: 35 percent weight each to Education and Housing, 15 percent weight Economic, 10 percent weight to Transportation, and 5 percent weight to Health.

The index values are shown in Map IV.126 on page 267. The lowest opportunity area index values (shown in yellow on the map) are in Central Los Angeles and to the southeast, near Westmont and Lynwood. Census tracts in the highest category of opportunity (those with values from 70.1 to 80 and shown in navy blue), can be found scattered throughout the peripheries of the county with large groupings near Rolling Hills and Rancho Palos Verdes, in the east of the county near Glendora and San Dimas, and near Santa Monica and Malibu. Note that no R/ECAPs are represented in areas with high levels of opportunity (any Census tracts with an opportunity value over 70.1). There are significant levels of opportunity in the moderately high opportunity areas, although three of these also show evidence of R/ECAP areas in downtown Los Angeles.

Map IV.126
Opportunity Areas Index
Los Angeles County Service Area
Developed and Compiled by WES



E. DISPROPORTIONATE HOUSING NEEDS

HOUSING COST BURDEN BY GROUP

Table IV.72 below shows data on households in the service area experiencing any one of four housing problems⁸⁵ by race or ethnicity and by household type and size.⁸⁶ As seen there, the race or ethnicity experiencing the highest percentage of housing problems are in the Hispanic population, with 66.5 percent of Hispanic households experiencing any one of the HUD-defined housing problems. Hispanic and Black households are the only racial or ethnic categories to experience housing problems at a higher rate than the average (54.3 percent in the service area).

The percentage of Asian and Native American households experiencing housing problems is far less than the Hispanic percentage, at around 50 percent for each group. White households fare even better, with only 43 percent of households experiencing any of the four housing problems.

As Table IV.72 also shows, family households with five or more people experience the greatest percentage of housing problems than do smaller or non-family households. This may be due to the fact that one of the HUD-defined housing problems is the presence of more than one person per room, and a household with five or more people is very likely to match this one criteria alone (unless of course the house has many rooms). Fully 75 percent of these households experience any of the four housing problems, the highest percentage of any category presented below.

Table IV.72

HUD AFFH Table 9 – Households Experiencing Any of 4 Housing Problems

Los Angeles County Service Area

2017 HUD AFFH Database

Race/Ethnicity	No. With Problems	No. Households	Percent With Problems	
White, Non-Hispanic	471,135	1,092,660	43.12%	
Black, Non-Hispanic	169,530	288,792	58.70%	
Hispanic	697,194	1,048,393	66.50%	
Asian or Pacific Islander, Non-Hispanic	213,553	425,862	50.15%	
Native American, Non-Hispanic	3,274	6,448	50.78%	
Other, Non-Hispanic	30,765	58,844	52.28%	
Total	1,585,544	2,921,444	54.27%	
Household Type and Size				
Family households, <5 people	736,166	1,500,620	49.06%	
Family households, 5+ people	329,747	445,549	74.01%	
Non-family households	519,664	975,234	53.29%	

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⁸⁵ HUD identifies four discrete housing problems that comprise this calculation: lack of complete kitchen facilities, lack of complete plumbing facilities, more than one person per room, and monthly housing costs (including utilities) exceeding 30 percent of monthly income.

⁸⁶ As this table was generated from the AFFH Online Mapping tool, no data was available for the non-entitlement cities of Artesia, Bradbury, Hidden Hills, Industry, Palos Verdes Estates, Rolling Hills, and Vernon.

Table IV.73 below shows severe housing problems for households in the service area, and while all percentages are lower, Hispanic households again experience the highest percentage.⁸⁷ As was the case with housing problems above, only Hispanic and Black households experience severe housing problems at a percentage higher than that of the service area. White households are again the lowest percentage of any racial or ethnic category, with only 23.5 percent experiencing any of four severe housing problems.

Table IV.73

HUD AFFH Table 9 – Households Experiencing Any of 4 Severe Housing Problems

Los Angeles County Service Area

2017 HUD AFFH Database

Race/Ethnicity	No. With Problems No. Households		Percent With Problems
White, Non-Hispanic	256,286	1,092,660	23.46%
Black, Non-Hispanic	104,472	288,792	36.18%
Hispanic	497,983	1,048,393	47.50%
Asian or Pacific Islander, Non-Hispanic	128,900	425,862	30.27%
Native American, Non-Hispanic	1,958	6,448	30.37%
Other, Non-Hispanic	18,233	58,844	30.99%
Total	1,008,134	2,921,444	34.51%

Table IV.74 below gives a further breakdown of severe housing cost (greater than 50 percent of income) by racial or ethnic categories and household type/size. As shown, Black households experience the highest percentage of racial/ethnic categories with severe housing cost burdens, at nearly 31 percent. Hispanic households constitute the next-highest percent, at nearly 29 percent. White and Asian households have the lowest percentages, at around 21 percent experiencing severe housing cost. The largest households (with five or more persons) fared better than smaller households, with only 21.9 percent experiencing severe housing cost (as opposed to 23.3 percent of smaller households and 28.8 percent of non-family households).

Table IV.74

HUD AFFH Table 10 – Households with Severe Housing Cost Burden

Los Angeles County Service Area

2017 HUD AFFH Database

Race/Ethnicity	No. With Problems	No. With Problems No. Households	
White, Non-Hispanic	229,518	1,092,660	21.01%
Black, Non-Hispanic	89,277	288,792	30.91%
Hispanic	299,997	1,048,393	28.61%
Asian or Pacific Islander, Non-Hispanic	92,864	425,862	21.81%
Native American, Non-Hispanic	1,533	6,448	23.77%
Other, Non-Hispanic	15,124	58,844	25.70%
Total	728,313	2,921,444	24.93%
Household Type and Size	•		•
Family households, <5 people	350,221	1,500,620	23.34%
Family households, 5+ people	97,332	445,549	21.85%
Non-family households	280,547	975,234	28.77%

Table IV.75, below, shows overcrowding and severe overcrowding by tenure in the service area. As shown there, a much higher rate of overcrowding and severe overcrowding can be found in renter-occupied housing than in owner-occupied housing. The rate of no

⁸⁷ The only difference between the 4 housing problems as defined above and the 4 severe housing problems referenced in Table IV.73 relates to the criterion of monthly housing cost: in severe housing problems, the monthly housing cost (including utilities) is greater than one-half a household's monthly income (as opposed to only 30 percent or more of a household's monthly income).

overcrowding among households has risen dramatically, up to 88.3 percent in 2015 from 77.4 percent in 2000, and severe overcrowding has fallen over the same time span, down to 4.8 percent from nearly 15 percent.

Table IV.75
Overcrowding and Severe Overcrowding

Los Angeles County Service Area 2000 Census SF3 & 2015 Five-Year ACS Data

Data Source	No Overd	rowding	Overcrowding		Severe Overcrowding		Total	
Data Source	Households	% of Total	Households	Households % of Total		Households % of Total		
			Owner					
2000 Census	1,181,207	87.0%	80,543	5.9%	96,276	7.1%	1,358,026	
2015 Five-Year ACS	1,288,896	94.5%	54,925	4.0%	20,297	1.5%	1,364,118	
	Renter							
2000 Census	1,014,376	68.6%	138,420	9.4%	325,738	22.0%	1,478,534	
2015 Five-Year ACS	1,327,883	83.0%	148,731	9.3%	122,428	07.7%	1,599,042	
Total								
2000 Census	2,195,583	77.4%	218,963	7.7%	422,014	14.9%	2,836,560	
2015 Five-Year ACS	2,616,779	88.3%	203,656	6.9%	142,725	4.8%	2,963,160	

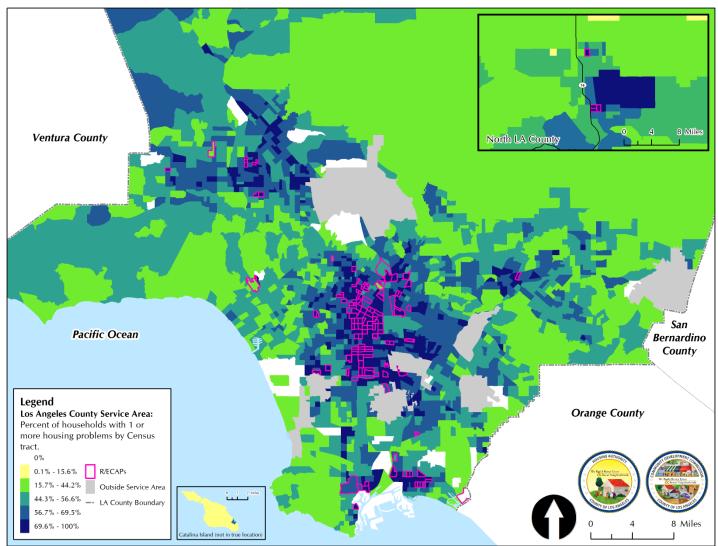
GEOGRAPHY OF HOUSING NEEDS

Service Area

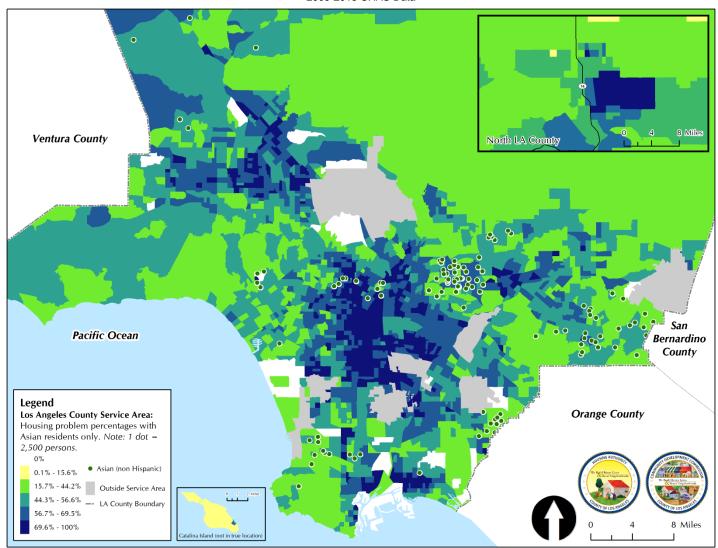
For the Los Angeles County Service Area, the following areas experience the greatest percentage of households with 1 or more housing problems: in and around Downtown Los Angeles (where the greatest concentration of R/ECAPs in the region are located); in the City of Long Beach; in southeast Los Angeles County, near Pomona; the area around San Fernando north of Los Angeles; and in north LA County near Lancaster and Palmdale (see Map IV.127 below). These areas align very closely with R/ECAPs in the service area, as there are only a few outer lying R/ECAPs that are not found in the one of the areas mentioned above.

Mexican-born residents largely reside in the areas with the highest concentration of housing burdens, as do residents born in El Salvador and Guatemala (see Map IV.131 on page 275). To a lesser extent, residents born in the Philippines reside in these same areas. Correspondingly, the largest racial or ethnic group most closely correlated with these housing problems is the Hispanic population in the region. More than any other racial or ethnic group, this group bears a disproportionately large share of housing burdens. The three maps starting on page 272 show housing problem percentages by Census tract with Asian, Black, and Hispanic residents respectively.

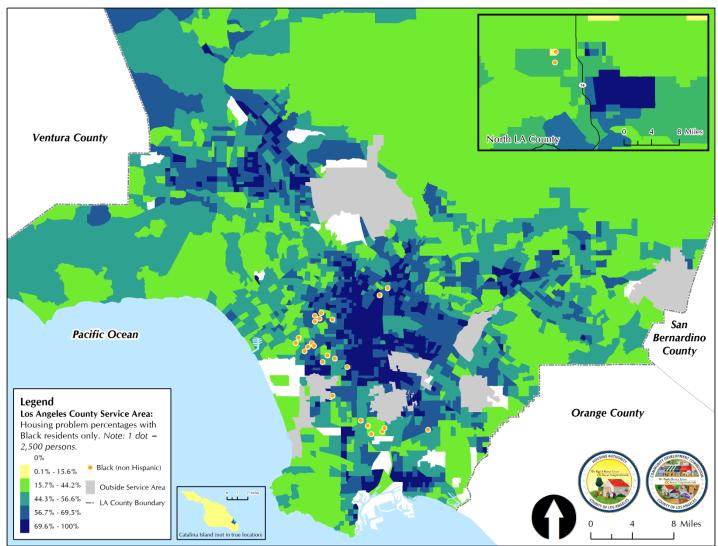
Map IV.127
Percent of Households with 1 or More Housing Problems
Los Angeles County Service Area
2009-2013 CHAS Data



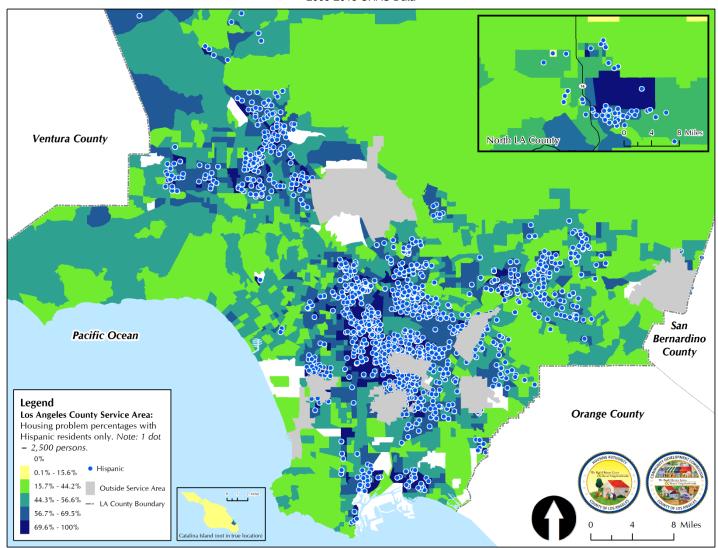
Map IV.128
Housing Problems with Asian Residents
Los Angeles County Service Area
2009-2013 CHAS Data



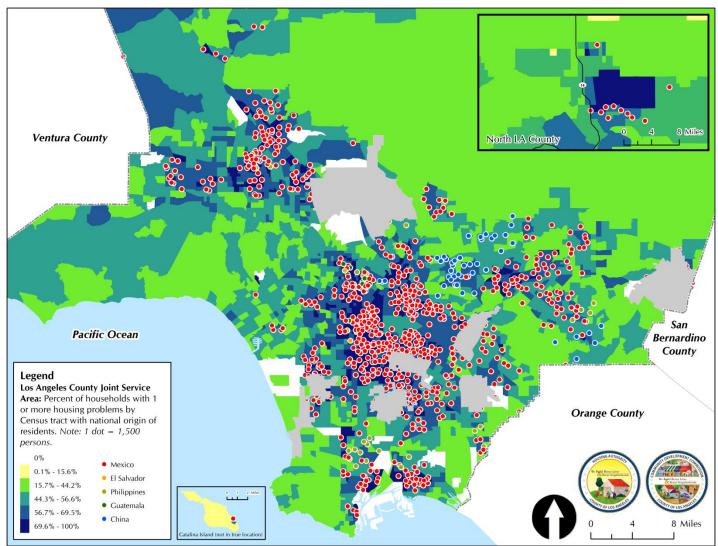
Map IV.129
Housing Problems with Black Residents
Los Angeles County Service Area
2009-2013 CHAS Data



Map IV.130
Housing Problems with Hispanic Residents
Los Angeles County Service Area
2009-2013 CHAS Data



Map IV.131
Housing Problems with National Origin of Residents
Los Angeles County Service Area
2009-2013 CHAS Data



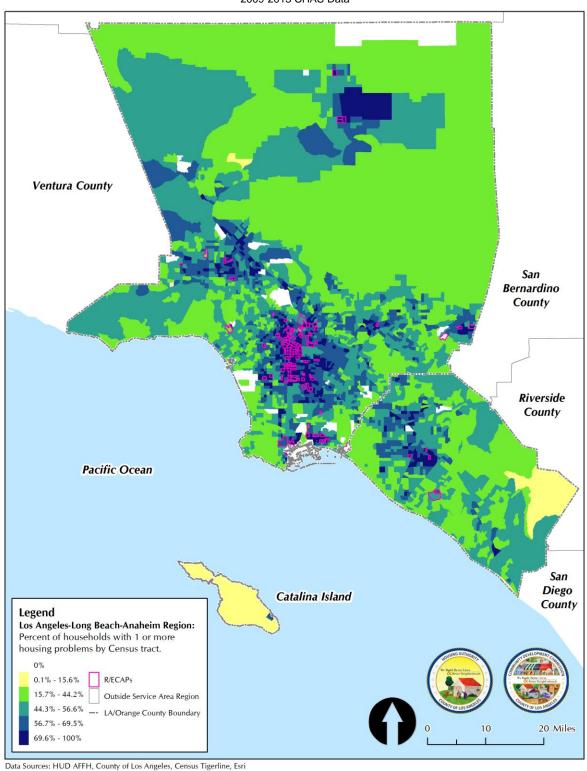
Region

For the Los Angeles-Long Beach-Anaheim Region, the following areas experience the greatest percentage of households with 1 or more housing problems: in and around Downtown Los Angeles (where the greatest concentration of R/ECAPs in the region are located); in the City of Long Beach; in southeast Los Angeles County, near Pomona; the area around San Fernando north of Los Angeles; in north LA County near Lancaster and Palmdale; and in Orange County around the City of Santa Ana (see Map IV.132 below). These areas align very closely with R/ECAPs in the region, as there are only a few outer lying R/ECAPs that are not found in the one of the areas mentioned above.

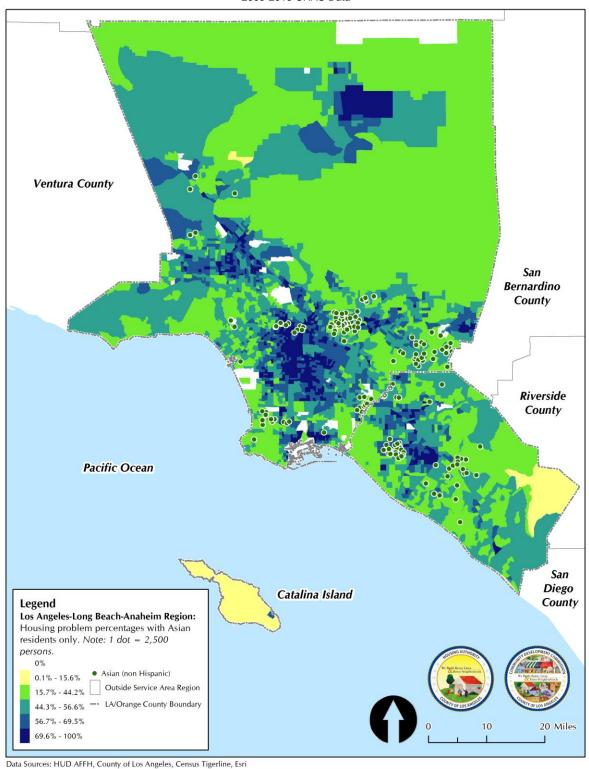
Mexican-born residents largely reside in the areas with the highest concentration of housing burdens, as do residents born in El Salvador and Guatemala. To a lesser extent, residents born in the Philippines reside in these same areas. Correspondingly, the largest racial or ethnic group most closely correlated with these housing problems is the Hispanic population in the region. More than any other racial or ethnic group, this group bears a disproportionately large share of housing burdens. The three maps starting on page 278 show housing problem percentages by Census tract with Asian, Black, and Hispanic respectively.

Map IV.132
Percent of Households with 1 or More Housing Problems

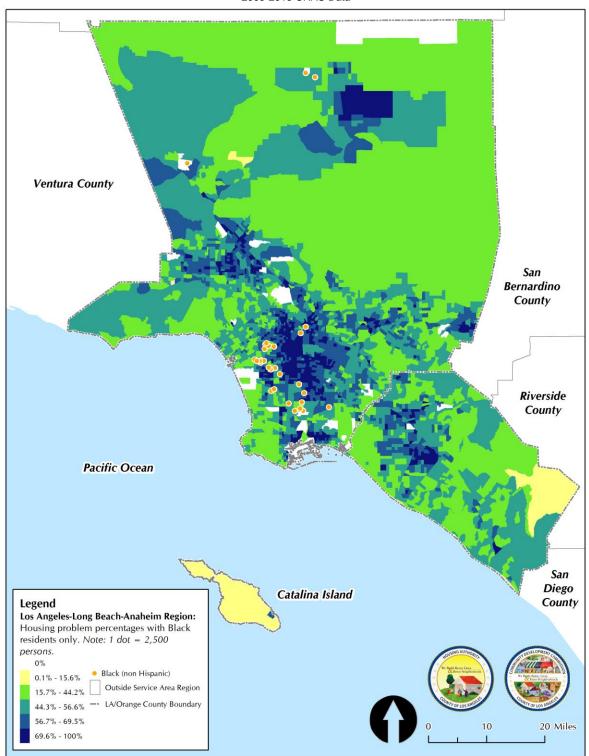
Los Angeles-Long Beach-Anaheim Region 2009-2013 CHAS Data



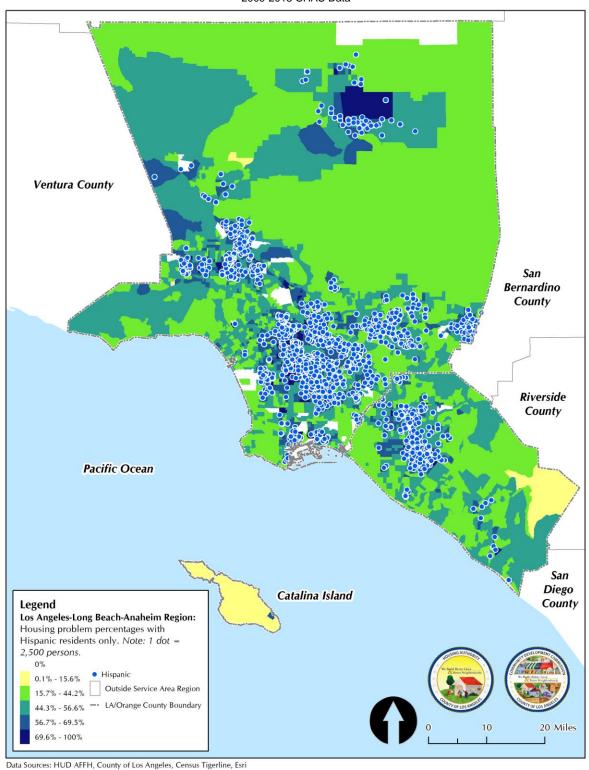
Map IV.133 Housing Problems with Asian Residents
Los Angeles-Long Beach-Anaheim Region
2009-2013 CHAS Data



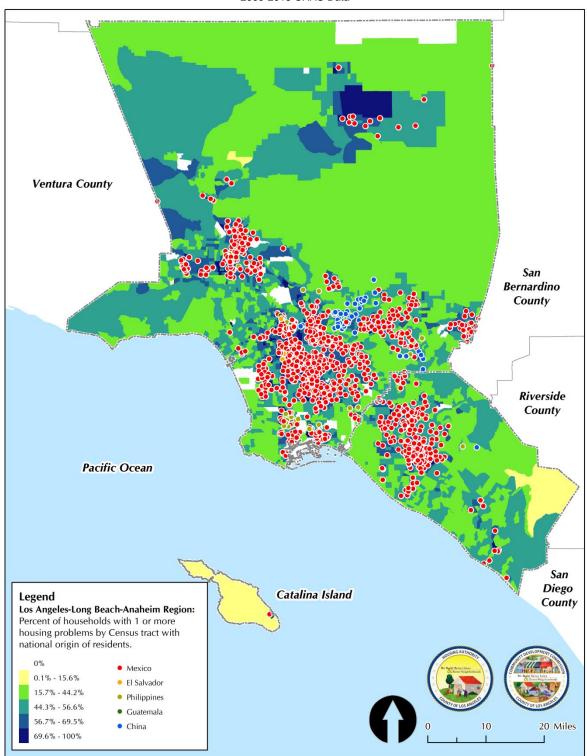
Map IV.134 Housing Problems with Black Residents
Los Angeles-Long Beach-Anaheim Region
2009-2013 CHAS Data



Map IV.135 Housing Problems with Hispanic Residents
Los Angeles-Long Beach-Anaheim Region
2009-2013 CHAS Data



Map IV.136 Housing Problems with National Origin of Residents
Los Angeles-Long Beach-Anaheim Region
2009-2013 CHAS Data



NEEDS OF FAMILIES WITH CHILDREN

Table IV.76 below shows households (abbreviated "HH" in the table) by housing program category, and percentages shown are of the specific category. So for the Public Housing Program, households with two bedrooms are the most prominent housing type, with nearly one-quarter of all public housing units having two bedrooms. Of all Project-Based Section 8 housing in the service area, 0-1 bedrooms was the most common housing type, with nearly 40 percent falling into this category. In the "Other Multifamily" category, the vast majority (nearly 50 percent) of households fall into the smallest unit type of 0-1 bedrooms. Of all publicly supported housing programs reported in the table below, the "Public Housing" type consisted of the highest percentage of households with children at roughly 28 percent, twice as high as the next-highest program (HCV Program, 14.5 percent of which were households with children).

Table IV.76
HUD AFFH Table 11 – Publicly Supported Housing by Program Category
Los Angeles County Service Area

Los Angeles County Service Area Compiled from HUD Database

Housing Program	HH in 0-1 E	R Units	HH in 2 BR Units		HH in 3+ BR Units		HH with Children	
Housing Program	Number	%	Number %		Number	%	Number	%
Public Housing	2,485	13.90%	4,190	23.43%	3,112	17.40%	4,948	27.67%
Project-Based Section 8	24,470	38.38%	5,863	9.20%	2,663	4.18%	5,353	8.40%
Other Multifamily	4,479	49.32%	70	0.77%	4	0.04%	26	0.29%
HCV Program	33,090	20.55%	27,009	16.77%	15,906	9.88%	23,433	14.55%

RENTER & OWNERSHIP RATES

Service Area

Renter-occupied housing units are most densely concentrated near downtown Los Angeles, around Long Beach, and in Santa Monica. Catalina Island also shows a very high percentage of rental housing, although the exact number of units is very small. As shown on the following maps (beginning on page 284), the highest concentrations of rentals corresponds most closely with the Hispanic populations around the service area, although there is a substantial population of Asian residents living in the Koreatown and Central LA neighborhoods that have large numbers of renter-occupied housing units in the vicinity.

Owner-occupied housing tends to be concentrated mostly in less population-heavy parts of LA County, namely, East LA County near the Orange and San Bernardino County borders, the cities around Rancho Palos Verdes in the southwest portion of the County, and most of western and northern LA County. To the east, these areas correspond with a fairly large population of Asian residents, while White residents dominate the areas of high owner-occupancy around Rancho Palos Verdes along the Highway 2 Corridor from West Hollywood to Santa Monica.

As shown below in Table IV.77, White residents represent the highest number of homeowners at nearly 45 percent of the total.⁸⁸ Both White and Asian residents have a higher percentage of homeownership than renting a housing unit, but Hispanic and Black residents have a higher

⁸⁸ As this table was generated from the AFFH Online Mapping tool, no data was available for the non-entitlement cities of Artesia, Bradbury, Hidden Hills, Industry, Palos Verdes Estates, Rolling Hills, and Vernon.

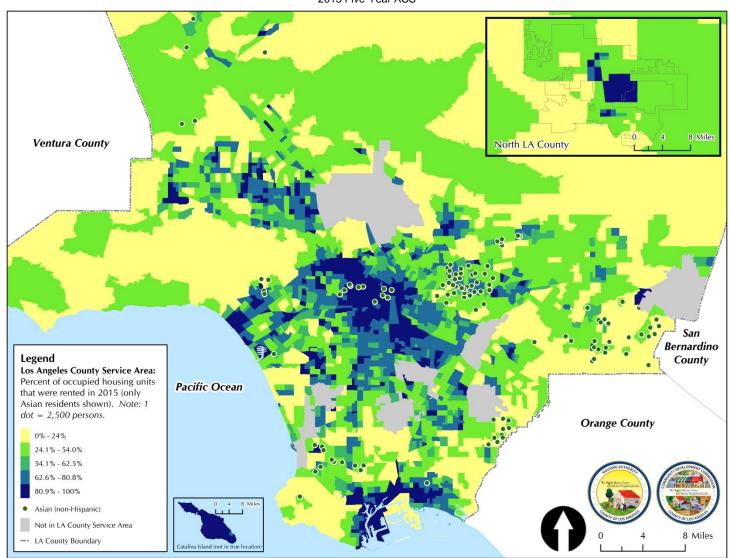
instance of renting than owning their housing unit. Hispanics represent the largest share of renters in the region, at nearly 44 percent of all renters.

Table IV.77
Homeownership and Rental Units by Race

Los Angeles County Service Area Compiled from HUD Database

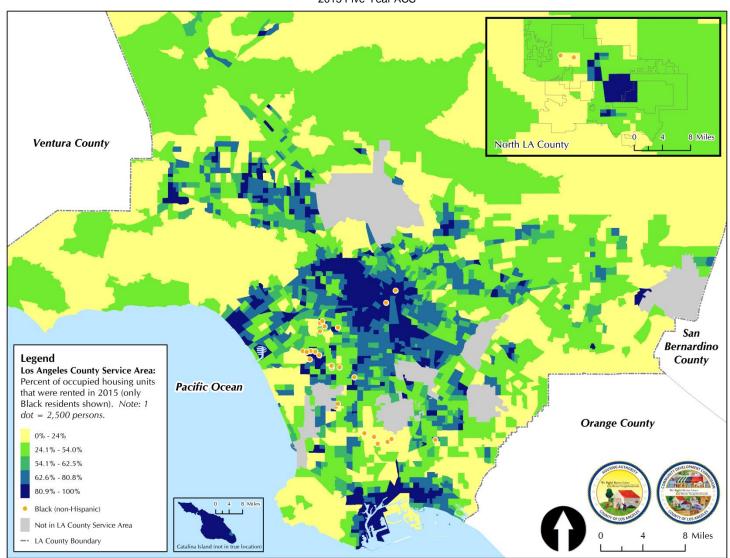
Dans on Ethnicitus	Home	owners	Renters				
Race or Ethnicity	Number	% of Total	Number	% of Total			
White (non-Hispanic)	205,179	44.68%	101,648	32.19%			
Black (non-Hispanic)	23,785	5.18%	23,532	7.45%			
Hispanic	127,693	27.80%	138,672	43.92%			
Asian (non-Hispanic)	94,475	20.57%	44,335	14.04%			
Native American (non-Hisp.)	1,144	0.25%	707	0.22%			
Other (non-Hispanic)	6,959	1.52%	6,959	2.20%			
Total Household Units	459,255	100.0%	315,754	100.0%			

Map IV.137 Renter-Occupied Housing (Asian Residents)
Los Angeles County Service Area



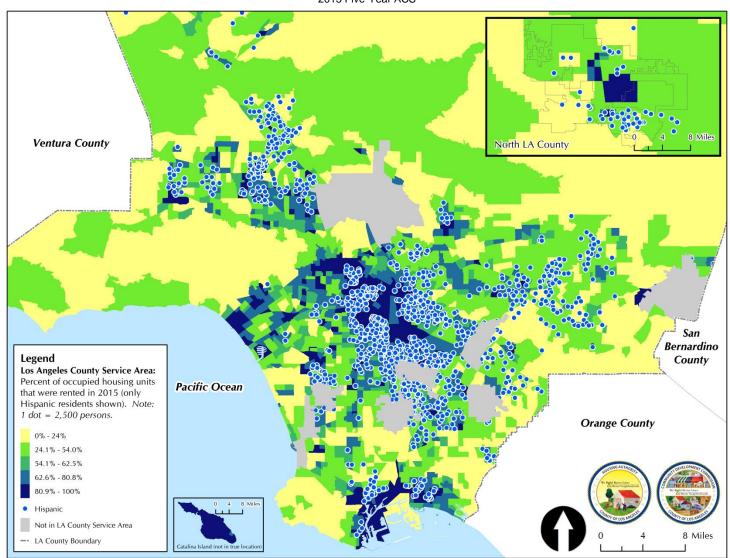
Data Sources: 2015 Five-Year ACS, 2010 Census, County of Los Angeles, Census Tigerline, Esri

Map IV.138 Renter-Occupied Housing (Black Residents)
Los Angeles County Service Area



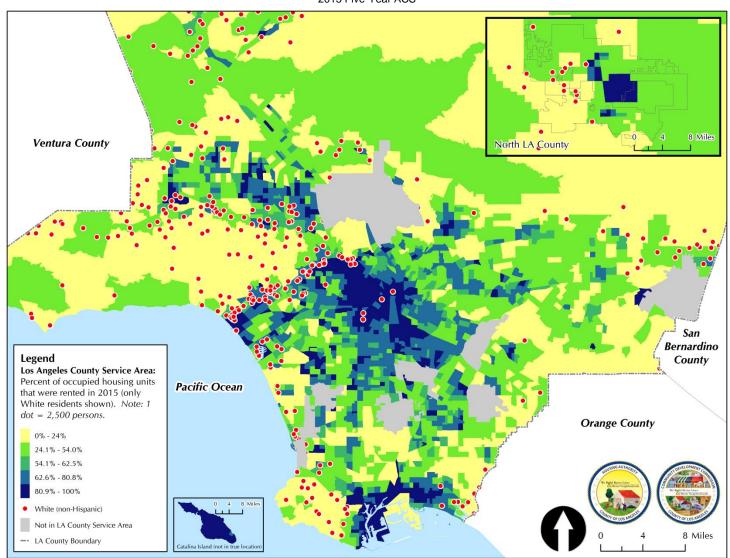
Data Sources: 2015 Five-Year ACS, 2010 Census, County of Los Angeles, Census Tigerline, Esri

Map IV.139
Renter-Occupied Housing (Hispanic Residents)
Los Angeles County Service Area



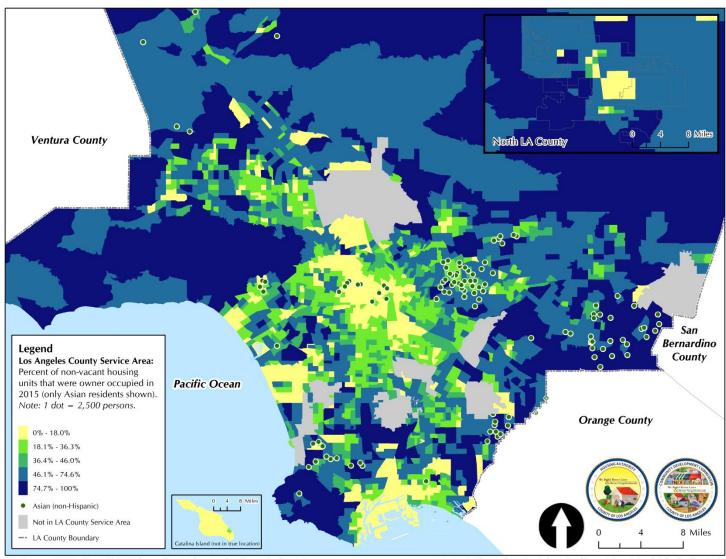
Data Sources: 2015 Five-Year ACS, 2010 Census, County of Los Angeles, Census Tigerline, Esri

Map IV.140 Renter-Occupied Housing (White Residents)
Los Angeles County Service Area



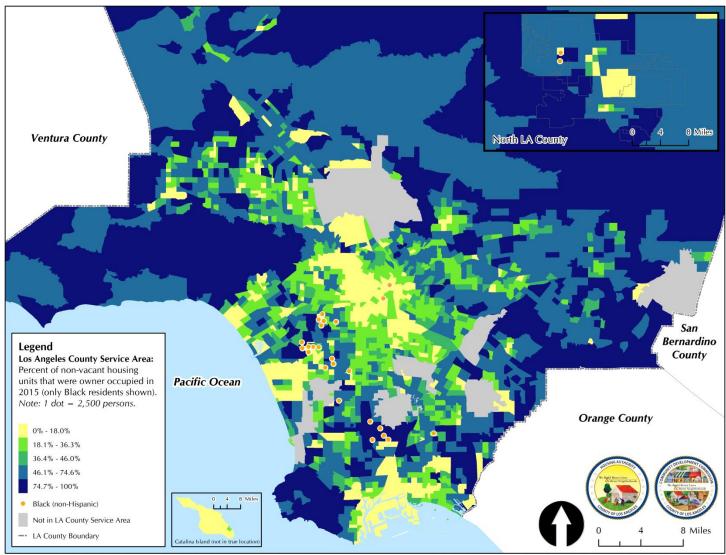
Data Sources: 2015 Five-Year ACS, 2010 Census, County of Los Angeles, Census Tigerline, Esri

Map IV.141 Owner-Occupied Housing (Asian Residents)
Los Angeles County Service Area



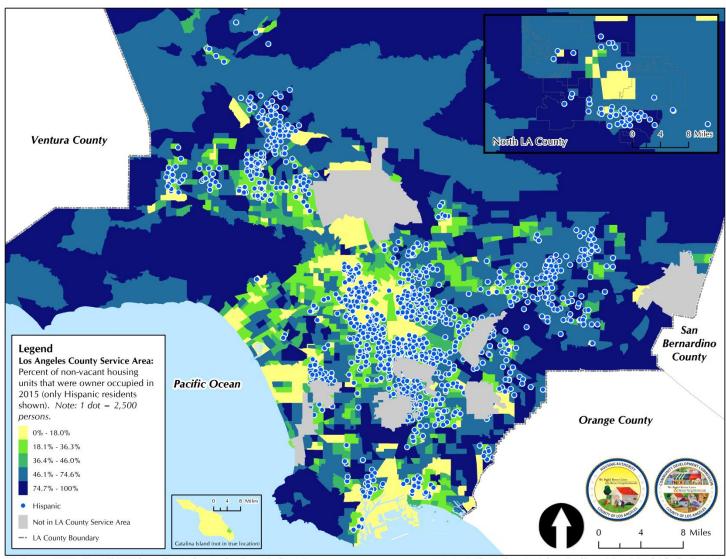
Data Sources: 2015 Five-Year ACS, 2010 Census, County of Los Angeles, Census Tigerline, Esri

Map IV.142 Owner-Occupied Housing (Black Residents)
Los Angeles County Service Area



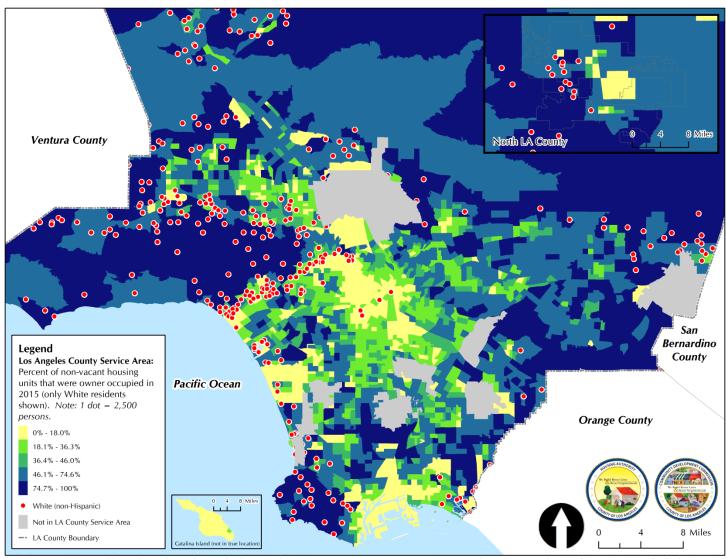
Data Sources: 2015 Five-Year ACS, 2010 Census, County of Los Angeles, Census Tigerline, Esri

Map IV.143
Owner-Occupied Housing (Hispanic Residents)
Los Angeles County Service Area



Data Sources: 2015 Five-Year ACS, 2010 Census, County of Los Angeles, Census Tigerline, Esri

Map IV.144 Owner-Occupied Housing (White Residents)
Los Angeles County Service Area



Data Sources: 2015 Five-Year ACS, 2010 Census, County of Los Angeles, Census Tigerline, Esri

Region

For the Los Angeles-Long Beach-Anaheim Region, with the exception of Catalina Island, the largest areas with rental-occupied housing units occur in and around Downtown Los Angeles, near San Fernando, around Long Beach, and in Orange County near Santa Ana and Costa Mesa. This corresponds closely with the largest population of Hispanics within the region and, to a lesser extent, the Black population in the region.

Census tracts with the highest percentage of owner-occupied housing occur in the regions around the San Gabriel Mountains; East Los Angeles County near Rowland Heights and Diamond Bar; west Los Angeles County around the Santa Monica Mountains National Recreation Area and Topanga State Park; and the bulk of the southeaster half of Orange County. While none of these areas align perfectly with a particular race or ethnicity, there are large amounts of White residents in the western part of Los Angeles County and southeastern Orange County and a large share of Asian residents in east Los Angeles County that appear to have high owner-occupied housing rates. The following maps, beginning on page 293, show 2015 housing by renter and ownership occupancy with ethnic/racial dot densities.

As shown below in Table IV.78, White residents represent the highest number of homeowners at just over 50 percent of the total.⁸⁹ Both White and Asian residents have a higher percentage of homeownership than renting a housing unit, but Hispanic and Black residents have a higher instance of renting than owning their housing unit. Hispanics represent the largest share of renters in the region, at just over 40 percent of all renters.

Table IV.78

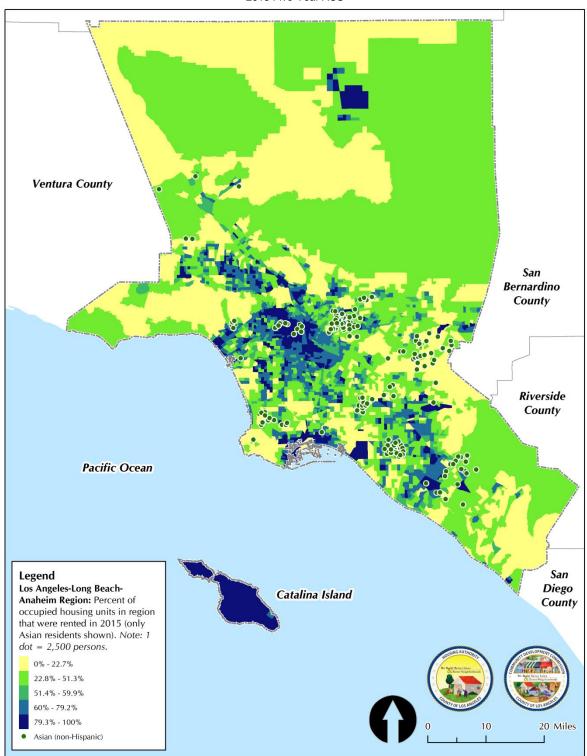
Homeownership and Rental Units by Race
Los Angeles-Long Beach-Anaheim Region
Compiled from HUD Database

Race or Ethnicity	Home	owners	Renters		
	Number	% of Total	Number	% of Total	
White (non-Hispanic)	1,057,430	50.37%	709,090	33.34%	
Black (non-Hispanic)	117,170	5.58%	215,920	10.15%	
Hispanic	548,615	26.13%	856,460	40.27%	
Asian (non-Hispanic)	336,885	16.05%	292,465	13.75%	
Native American (non-Hisp.)	4,345	0.21%	5,170	0.24%	
Other (non-Hispanic)	34,905	1.66%	47,440	2.23%	
Total Household Units	2,099,350	100.0%	2,126,545	100.0%	

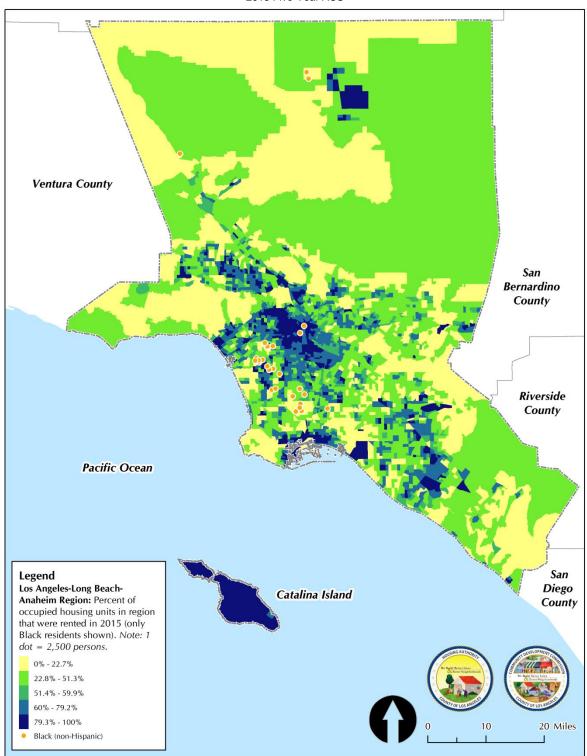
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⁸⁹ As this table was generated from the AFFH Online Mapping tool, no data was available for the non-entitlement cities of Artesia, Bradbury, Hidden Hills, Industry, Palos Verdes Estates, Rolling Hills, and Vernon.

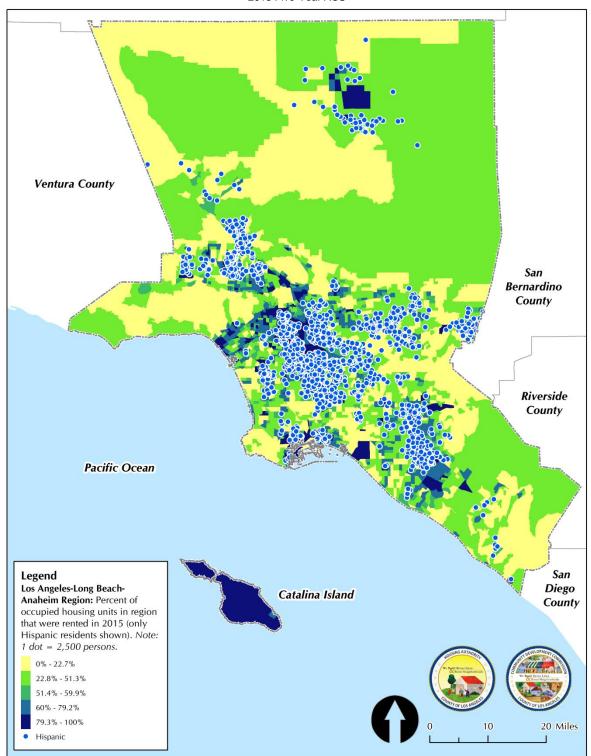
Map IV.145 Renter-Occupied Housing (Asian Residents)
Los Angeles-Long Beach-Anaheim Region
2015 Five-Year ACS



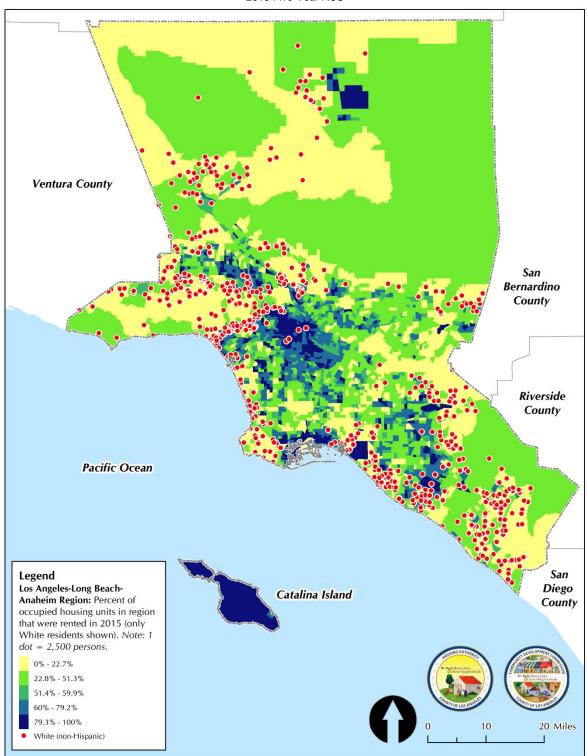
Map IV.146 Renter-Occupied Housing (Black Residents)
Los Angeles-Long Beach-Anaheim Region
2015 Five-Year ACS



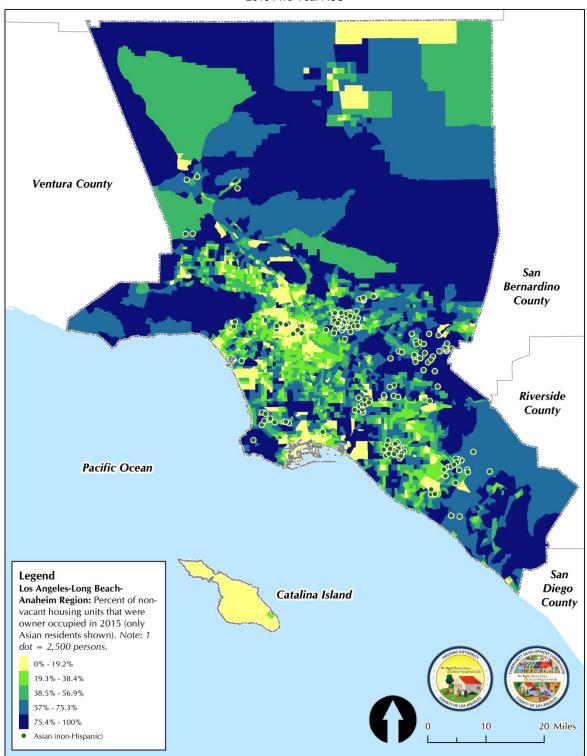
Map IV.147 Renter-Occupied Housing (Hispanic Residents)
Los Angeles-Long Beach-Anaheim Region
2015 Five-Year ACS



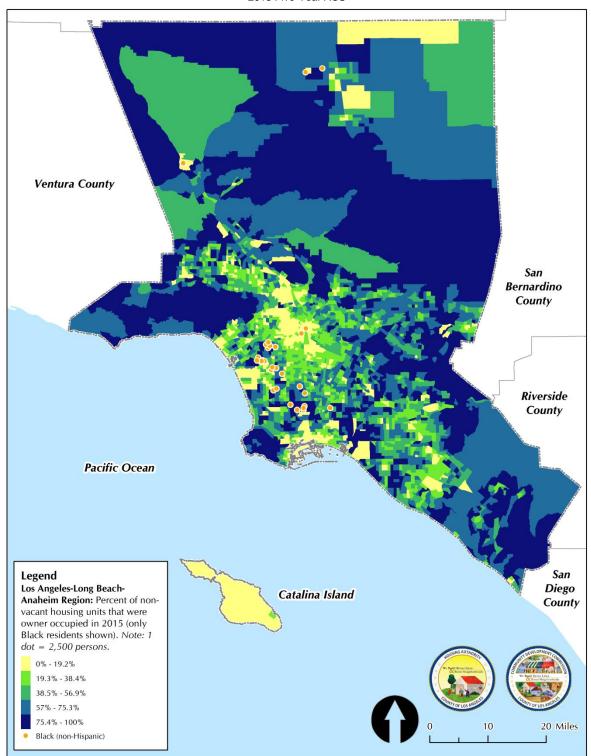
Map IV.148 Renter-Occupied Housing (White Residents)
Los Angeles-Long Beach-Anaheim Region
2015 Five-Year ACS



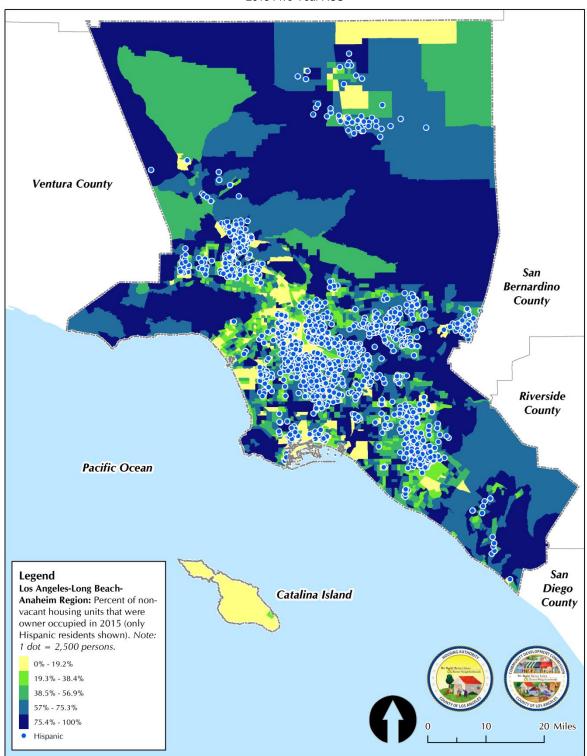
Map IV.149 Owner-Occupied Housing (Asian Residents) Los Angeles-Long Beach-Anaheim Region 2015 Five-Year ACS



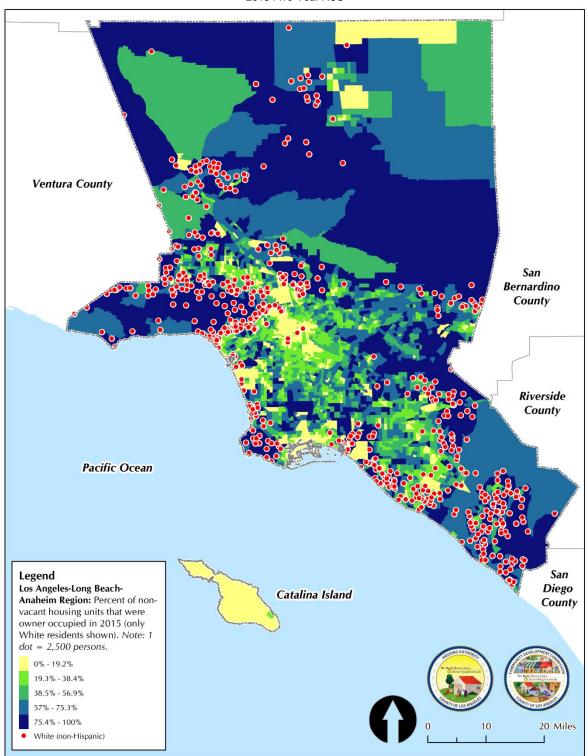
Map IV.150 Owner-Occupied Housing (Black Residents)
Los Angeles-Long Beach-Anaheim Region
2015 Five-Year ACS



Map IV.151 Owner-Occupied Housing (Hispanic Residents)
Los Angeles-Long Beach-Anaheim Region
2015 Five-Year ACS



Map IV.152 Owner-Occupied Housing (White Residents) Los Angeles-Long Beach-Anaheim Region 2015 Five-Year ACS



ADDITIONAL INFORMATION

Age of Housing Stock

Table IV.79 below shows households by year built, per the 2000 Census and 2015 Five-Year ACS. As can be seen there, the decade with the highest home-building rates occurred in the 1950s, with nearly one in five homes built then. This percentage has only dipped slightly since the 2000 Census. The table also highlights that most of the service area's housing stock is at least 50 years old: 61.5 percent of the homes in the service area were built during or prior to the 1960s. Possibly due to the Great Recession, home building slowed somewhat in the first decade of the 21st Century as compared to the 1990s, down 7.2 percent since then.

Table IV.79
Households by Year Home Built

Los Angeles County Service Area 2000 Census SF3 & 2015 Five-Year ACS Data

Year Built	2000 Ce	ensus	2015 Five-Year ACS		
Teal Built	Households % of Total		Households	% of Total	
1939 or Earlier	370,787	13.1%	448,485	15.1%	
1940 to 1949	339,481	12.0%	313,640	10.6%	
1950 to 1959	630,517	22.2%	610,245	20.6%	
1960 to 1969	509,364	18.0%	439,912	14.8%	
1970 to 1979	444,473	15.7%	418,661	14.1%	
1980 to 1989	348,213	12.3%	343,619	11.6%	
1990 to 1999	193,725	6.8%	189,072	6.4%	
2000 to 2009			178,355	6.0%	
2010 or Later			21,171	%	
Total	2.836.560	100.0%	2.963.160	100.0%	

Housing Costs by Income

Table IV.80 below shows a breakdown of monthly housing costs by occupied housing tenure in Los Angeles County. Within all occupied housing units, over one-quarter of housing costs are in the \$1,000 - \$1,499 range, while over 10 percent of occupied housing units incurred monthly costs in the highest range (\$3,000 or more). It is clear from the data below that higher housing costs are associated with owner-occupied units, as over 30 percent of owner-occupied units incur costs in the highest range, while only 5.4 percent of renter-occupied units incur costs in the same category. Interestingly, owner-occupied units do have lower costs on the far end of the spectrum, as 12.8 percent of these units had \$499 or less in monthly costs, while that same category of housing costs comprised only 5.1 percent of renter-occupied housing.

Table IV.80
Housing Costs by Tenure
Los Angeles County

2015 Five-Year ACS Data

Monthly Housing Cost	Total Occupied Housing Units	Owner-Occupied Units	Renter-Occupied Units	
Less than \$300	3.50%	4.70%	2.50%	
\$300 to \$499	5.10%	8.10%	2.60%	
\$500 to \$799	9.40%	9.10%	9.60%	
\$800 to \$999	10.30%	4.50%	15.30%	
\$1,000 to \$1,499	25.30%	12.30%	36.40%	
\$1,500 to \$1,999	17.00%	15.80%	18.10%	
\$2,000 to \$2,499	10.70%	14.30%	7.60%	
\$2,500 to \$2,999	6.50%	10.70%	3.00%	
\$3,000 or more	10.80%	20.70%	2.40%	
No cash rent	1.40%	(X)	2.50%	
Median (dollars)	\$1,409	\$1,864	\$1,231	

For additional tables regarding housing burden and disproportionate housing needs, see Technical Appendix Section I ("Additional Census Data & Maps").

CONTRIBUTING FACTORS OF DISPROPORTIONATE HOUSING NEEDS

Affordable Housing

In an editorial published in January of 2015, the LA Times quoted a Harvard study that claimed that Los Angles housing prices have grown four times faster than incomes since 2000 and is considered, by the same study, to be the least affordable of the nation's 381 metro areas. ⁹⁰ The study points to the promising development of public transit lines around the City, and encourages the "right planning [that] can create policies that will incentivize or require developers to build more affordable housing as a return on taxpayers' investment." ⁹¹

For the Los Angeles-Long Beach-Anaheim Region, research suggests there isn't nearly enough affordable housing. The California Housing Partnership Corporation (CHPC) with the Corporation for Supportive Housing (CSH) for the Los Angeles County Affordable Housing Coordinating Committee developed A Template for Los Angeles County's Annual Affordable Housing Outcomes Report. The study found a loss of more than \$274 million in affordable housing funding annually due, in part, to the state's elimination of Redevelopment funding in 2012. As a result, the County has a shortage of affordable housing units available to residents. Households earning less than 50 percent AMI are cost burdened, with the County estimating a shortfall of over 550,000 rental households for this income group. The study estimates that 41 percent of very low income households, or those between 30 and 50 percent AMI, are severely cost burdened (see Table IV.81 below).

Table IV.81

Housing Affordability Gap Analysis for Renter Households

Los Angeles County

Template for Los Angeles County's Annual Affordable Housing Outcomes Report

	DLI	ELI	VLI
	0-15% AMI	15-30% AMI	30-50% AMI
Households within Income Category	166,009	337,970	323,860
Rental Homes "affordable & Available" to Income Group	15,372	68,848	162,375
Surplus or Deficit of Affordable Rental Homes Within Income Category	-150,637	-269,122	-161,484

⁹⁰ http://www.latimes.com/opinion/editorials/la-ed-affordable-housing-part-1-20150111-story.html

⁹¹ ibid.

⁹² http://chpc.net/wp-content/uploads/2016/03/Los-Angeles-County-AH-Outcomes-Report-Template.pdf

F. PUBLICLY SUPPORTED HOUSING

PUBLICLY SUPPORTED HOUSING DEMOGRAPHICS

Table IV.82, below, shows four categories of publicly supported housing in the service area and how many households of each racial or ethnicity group occupy this kind of housing. ⁹³ Hispanic households constitute the majority of public housing households (over 62 percent), with Blacks representing another quarter of these households. Asian households constitute the largest share of households in Other Multifamily and Project-Based Section 8 housing. The largest share of White households in a public housing category occurs in Other Multifamily housing, with White households constituting nearly 30 percent of all households in this program. Section 8 housing is by far the most evenly distributed of the public housing categories among race/ethnicities, with each race or ethnicity representing between 20 and 30 percent of the total. ⁹⁴

Table IV.82
HUD AFFH Table 6 – Publicly Supported Households by Race/Ethnicity

Los Angeles County Service Area Compiled from HUD Database

Public Housing	Whit	е	Black		Hispanic		Asian		Total Public Housing HH
Category	#	% of Total	#	% of Total	#	% of Total	#	% of Total	#
Public Housing	683	7.0%	2,627	26.9%	6,110	62.6%	344	3.5%	9,764
Project-Based Section 8	6,942	21.4%	6,555	20.2%	9,344	28.8%	9,587	29.6%	32,428
Other Multifamily	1,300	29.8%	405	9.3%	963	22.1%	1,691	38.8%	4,359
HCV Program	14,579	19.4%	37,550	49.9%	18,195	24.2%	4,989	6.6%	75,313
Total Public Housing HHs	23,504		47,137		34,612		16,611		
Total Households	1,092,660	37.4%	288,792	9.9%	1,048,393	35.9%	425,862	14.6%	=

Table IV.83 below shows demographic data from the Housing Authority of the County of Los Angeles (HACoLA) in each of its public and affordable housing facilities around the LA County.

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⁹³ The data, unlike that of the following table, come from the HUD Database and only shows public housing numbers by program category, not facility.

⁹⁴ As this table was generated from the AFFH Online Mapping tool, no data was available for the non-entitlement cities of Artesia, Bradbury, Hidden Hills, Industry, Palos Verdes Estates, Rolling Hills, and Vernon.

Table IV.83 Race/Ethnicity Breakdown by HACoLA Facility

Los Angeles County Service Area
Housing Authority of the County of Los Angeles

	Asian (non-	rity of the County of Black (non-		White (non-	Total	
Facility Name/Location	Hispanic)	Hispanic)	Hispanic	Hispanic)	Residents	
105th & 106th Streets	. , 0	11	2	. ,	13	
111th & Firmona	0	1	1	0	2	
4th & Mednik	0	0	2	0	2	
88th & Beach	0	3	0	1	4	
92nd & Bandera	0	7	1	0	8	
Addington & Waldorf	0	3	0	0	3	
Arizona & Olympic	0	1	16	0	17	
Athens	0	6	4	0	10	
Budlong Crest	0	2	2	1	5	
Carmelita Avenue	0	0	2	0	2	
Carmelitos Family	5	332	190	23	550	
Carmelitos Seniors	11	61	50	27	149	
Century & Wilton	0	37	2	0	39	
East 119th Street	0	1	0	0	1	
East 61 Street	0	5	1	Ö	6	
East 83rd Street	0	1	1	0	2	
East 84th Street	Ō	4	0	Ö	4	
East 87th Street	0	3	0	0	3	
El Segundo I	0	26	3	1	30	
El Segundo II	0	12	4	1	17	
Foothill Villa	12	8	15	26	61	
Francisquito Villa Seniors	20	0	60	6	86	
Harbor Hills	5	147	118	25	295	
Herbert Avenue	2	0	40	3	45	
Imperial Heights	0	5	4	0	9	
Insley St.	0	2	0	0	2	
Jarvis Avenue	0	1	0	0	1	
Marina Manor II	1	17	17	35	70	
Marina Manor Senior	3	14	14	81	112	
McBride Avenue	0	0	2	1	3	
Monica Manor	1	7	3	6	17	
Nueva Maravilla Family	13	9	319	5	346	
Nueva Maravilla Seniors	41	2	102	3	148	
Ocean Park	0	7	5	7	19	
Orchard Arms Senior	17	22	51	86	176	
Palm Apartments Senio	5	15	17	87	124	
Quartz Hill I Family	0	13	3	3	19	
Quartz Hill II Family	1	1	18	1	21	
Simmons Avenue	0	0	4	0	4	
Southbay Gardens Senior	2	75	16	3	96	
Sundance Vista	0	2	37	0	39	
Triggs Street	0	0	3	0	3	
West 106th Street	0	18	2	0	20	
Total	139	881	1,131	432	2,583	
			•		,	

Hispanics comprise the largest share of the groups shown in the table above, with nearly 44 percent of all residents. Asian residents comprise the smallest share, at only 5.4 percent of the total. Whites (16.7 percent) and Blacks (34.1 percent) round out the middle two classes. There are exactly six facilities with 100 percent occupancy by Black residents and four facilities with 100 percent Hispanic residents; neither Asian nor White residents comprise sole occupancy of a single facility. The largest facility, Carmelitos Family, is located in Long Beach and contains over 20 percent of all residents living in HACoLA facilities within the County. It also contains the largest number of Black residents and second-most number of Hispanic residents of any facility in the County; Nueva Maravilla Family, with 319 Hispanic residents, is the highest total of that class of any facility in the County. Another major public housing facility, Harbor Hills, contains 295 residents, nearly half of whom are Black, and is located in Lomita.

DEMOGRAPHIC COMPARISON

As seen in Table IV.82 above, white households have a disproportionately smaller share in public housing for each of the four categories presented than overall population share. On the contrary, Black households represent a larger share in three of the four public housing categories than overall household share in the service area; Asian households are over-representative in two of the categories (Other Multifamily and Project-Based Section 8); and Hispanic households are over-representative of only one category (Public Housing).

PUBLICLY SUPPORTED HOUSING LOCATION AND OCCUPANCY

Beginning with Map IV.153 below, the following four maps show the location of Project-Based Section 8 public housing and other multifamily public housing in the service area along with dot densities of racial or ethnic populations. These maps also contain R/ECAP Census tracts in black.

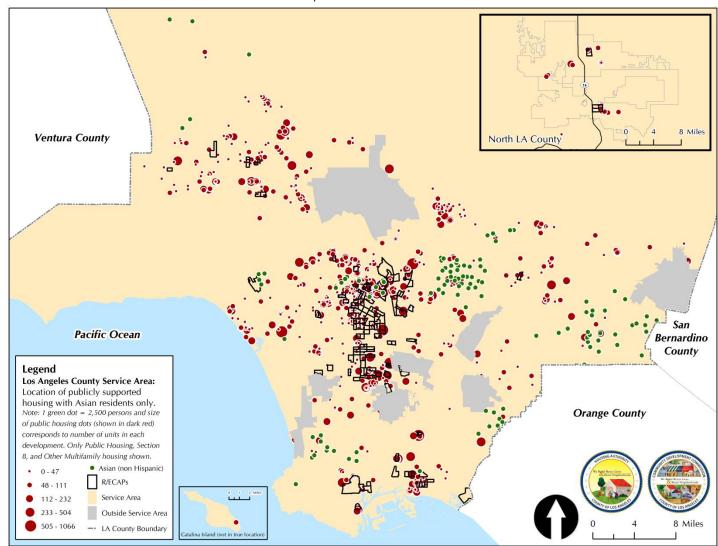
As can be seen there, Asian populations do not align very closely with public housing locations, but they do to a small degree in locations near East LA, Monterey Park, and Alhambra. The largest Black population clusters are southwest of Downtown Los Angeles, and while these areas do have some public housing locations, they are not as numerous as elsewhere around the service area. The Hispanic population seems most geographically aligned with public housing locations (see Map IV.155 on page 308). Large populations of Hispanic residents in Los Angeles, East Los Angeles, San Fernando, and Long Beach are in close proximity to many public housing units, and there are many R/ECAPs in these same locations.

Map IV.157 on page 310 (and the following four maps) show housing units occupied with housing choice voucher (HCV) residents by race and ethnicity. The vast majority of HCVs used by Asian residents can be found near Alhambra and Monterey Park, with almost none of these vouchers being used in an R/ECAP area. On the other hand, the largest numbers of Black HCVs are in South Central Los Angeles, near Downey and Paramount, and in North LA County in Lancaster and Palmdale; most of the vouchers in South Central LA are in or around R/ECAP areas (see Map IV.158 on page 311).

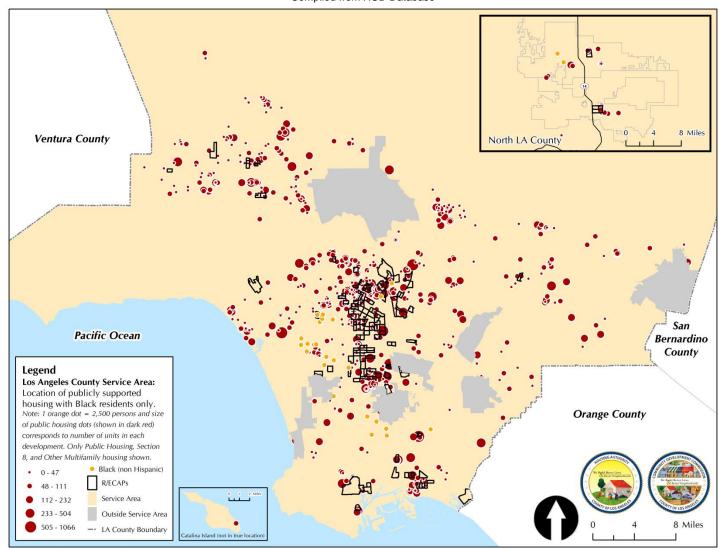
Hispanic vouchers are most prevalent east of Los Angeles near Montebello, Rosemead, East LA, Downey, and South Whittier, as well as in the northern portion of the county (see Map IV.159 on page 312). Aside from in Lancaster and Palmdale, most of these vouchers do not fall in R/ECAP areas. Similarly, most vouchers used by White residents in West Hollywood and clustered along Highway 72 in the southeastern portion of the county are not located in R/ECAPs, but those in Lancaster and Palmdale are (see Map IV.160 on page 313).

Low income housing tax credits (LIHTCs) are shown beginning with Map IV.161 on page 314. Asian and Black residents do not appear in large numbers near LIHTCs, but Hispanics residents and, to a lesser extent, White residents do. The largest presence of LIHTCs near White populations occurs near Santa Monica and West Hollywood (Map IV.164), while the largest Hispanic clusters appear near LIHTCs in Downtown Los Angeles (Map IV.163).

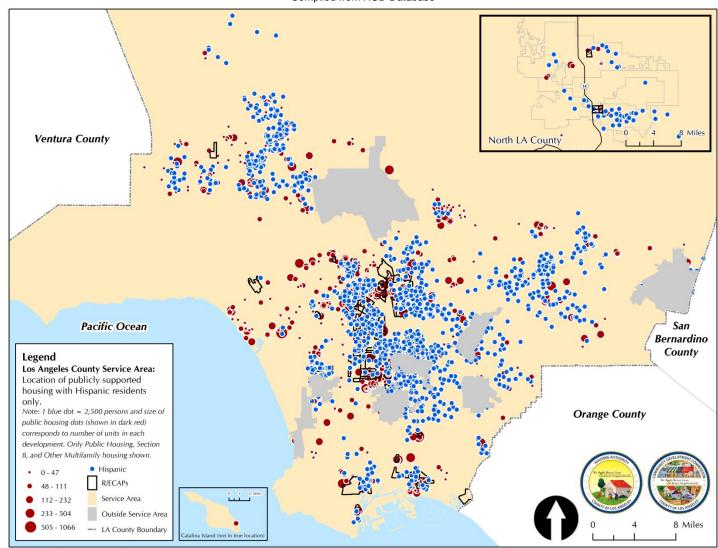
Map IV.153
Public Housing Locations and Asian Residents
Los Angeles County Service Area
Compiled from HUD Database



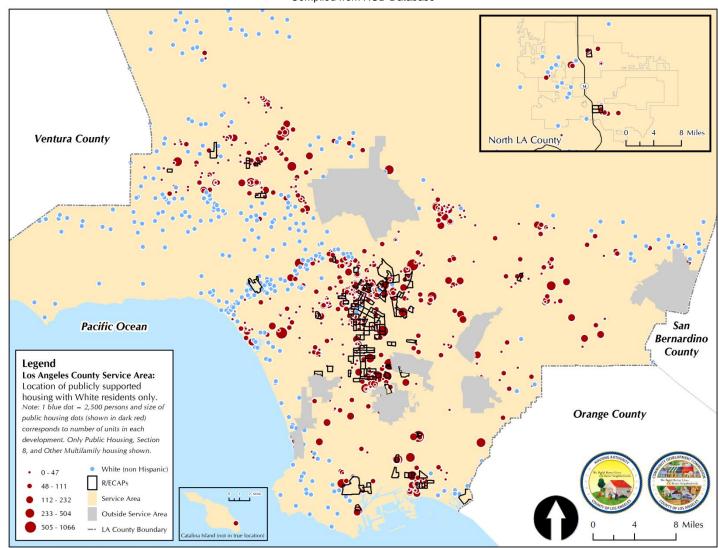
Map IV.154
Public Housing Locations and Black Residents
Los Angeles County Service Area
Compiled from HUD Database



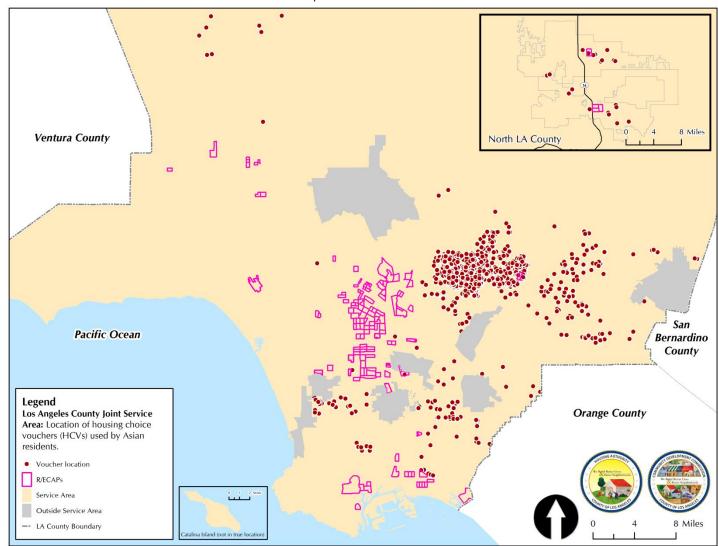
Map IV.155
Public Housing Locations and Hispanic Residents
Los Angeles County Service Area
Compiled from HUD Database



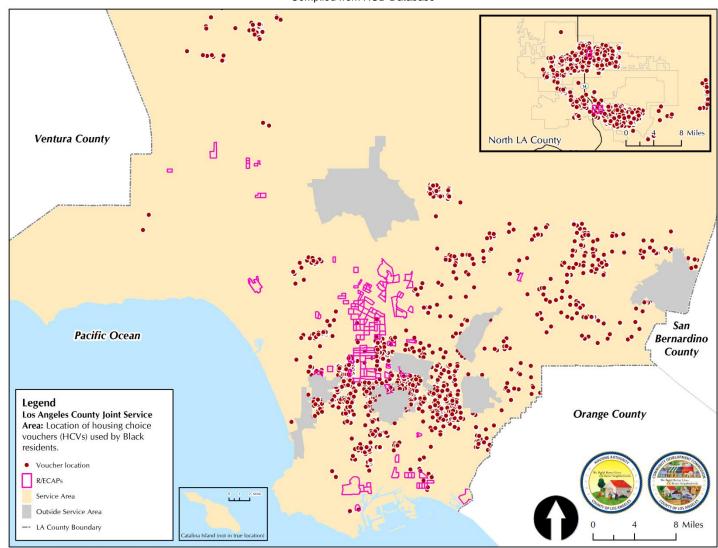
Map IV.156
Public Housing Locations and White Residents
Los Angeles County Service Area
Compiled from HUD Database



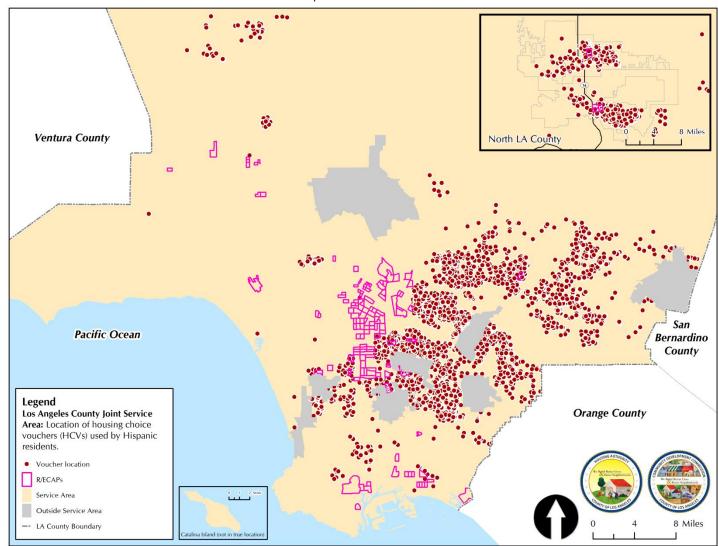
Map IV.157
Housing Choice Vouchers (HCVs) Used by Asian Residents
Los Angeles County Service Area
Compiled from HUD Database



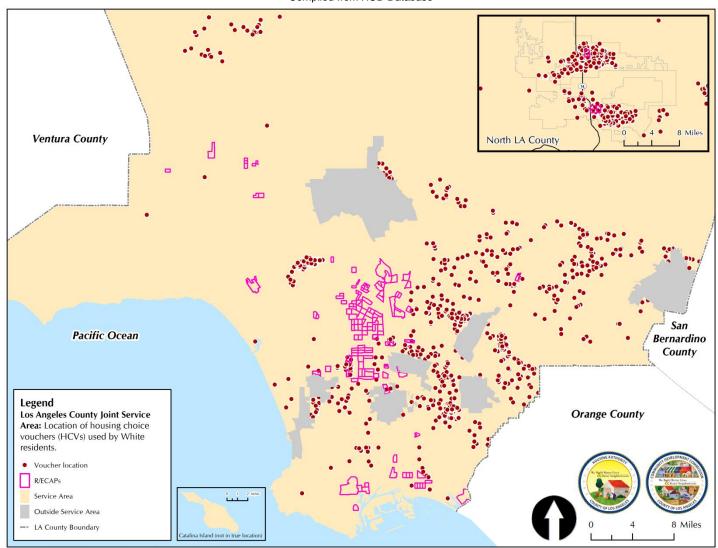
Map IV.158
Housing Choice Vouchers (HCVs) Used by Black Residents
Los Angeles County Service Area
Compiled from HUD Database



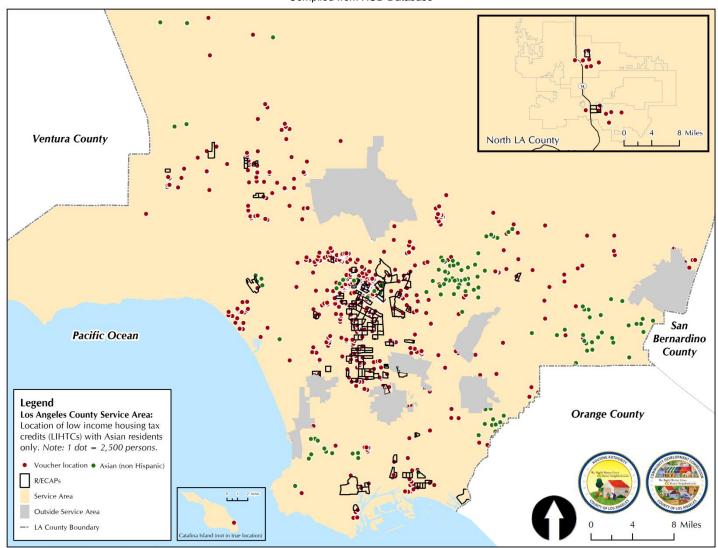
Map IV.159
Housing Choice Vouchers (HCVs) Used by Hispanic Residents
Los Angeles County Service Area
Compiled from HUD Database



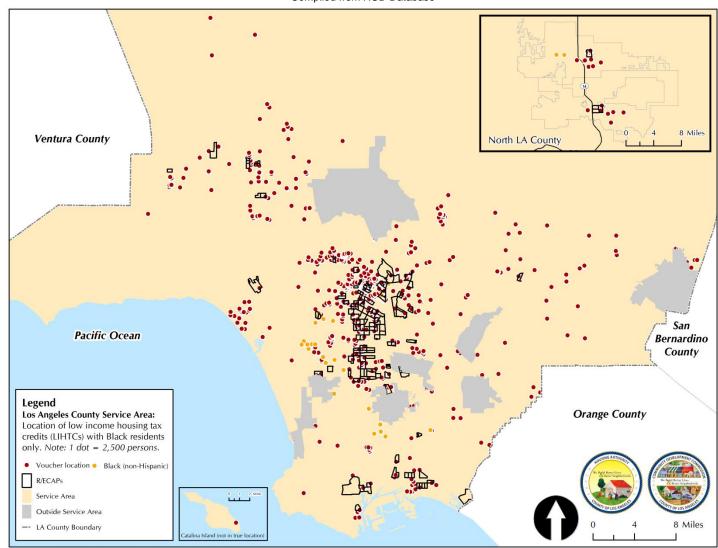
Map IV.160
Housing Choice Vouchers (HCVs) Used by White Residents
Los Angeles County Service Area
Compiled from HUD Database



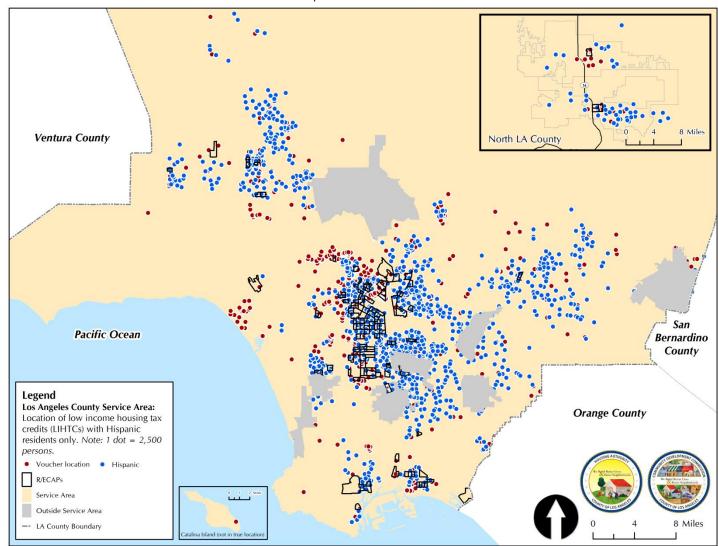
Map IV.161
Low Income Housing Tax Credits (LIHTCs) with Asian Residents
Los Angeles County Service Area
Compiled from HUD Database



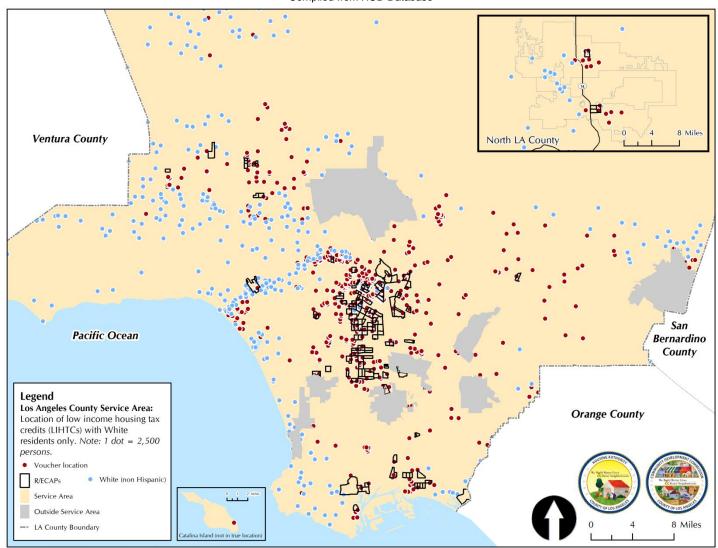
Map IV.162
Low Income Housing Tax Credits (LIHTCs) with Black Residents
Los Angeles County Service Area
Compiled from HUD Database



Map IV.163
Low Income Housing Tax Credits (LIHTCs) with Hispanic Residents
Los Angeles County Service Area
Compiled from HUD Database



Map IV.164
Low Income Housing Tax Credits (LIHTCs) with White Residents
Los Angeles County Service Area
Compiled from HUD Database



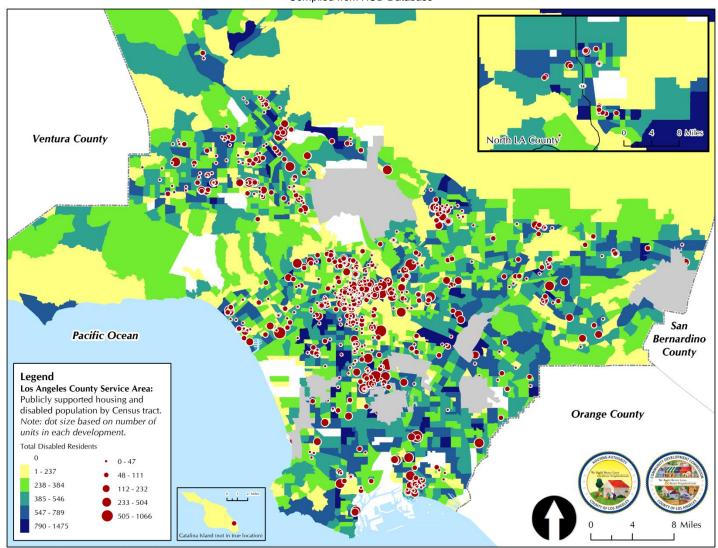
PUBLIC HOUSING FOR OTHER CLASSES

Map IV.165 below shows the disabled population in the service area with a yellow-blue shading gradient with a public housing dot overlay. Darker shades show greater numbers of disabled residents in a given Census tract. Neighborhoods just southwest of Downtown LA contain Census tracts with large numbers of disabled residents and also public housing units. North LA County also contains high numbers of residents with disabilities in the same locations as public housing. And, to a lesser extent, neighborhoods in north LA contain both large numbers of disabled persons living in areas with public housing.

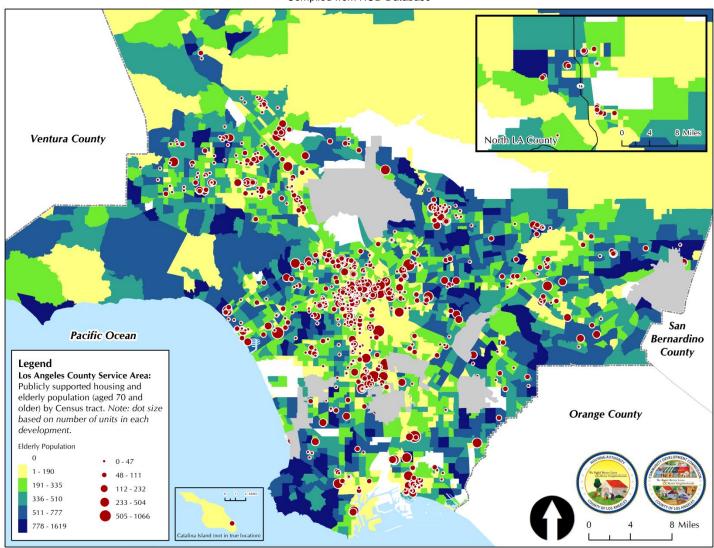
Map IV.166 on page 320 shows the elderly population in the service area (aged 70 and older) as a yellow-blue shaded map with a public housing dot overlay. Darker shades show greater numbers of elderly residents in a given Census tract. As seen there, the largest elderly populations can be found in western LA County around the Santa Monica Mountains; southwest LA County near Palos Verdes Estates and Rolling Hills; and in patches of eastern LA County. These populations, however, do not align themselves with very much public housing, as the largest clusters of public housing appear in areas with lower levels of elder populations.

In a similar fashion, Map IV.167 on page 321 shows families with children in the service area as a shaded map with a public housing dot overlay. Darker shades show greater numbers of families with children in a given Census tract. Census tracts with large numbers of families with children do not appear to have much public housing, except in northern LA County near Lancaster and Palmdale. Long Beach, similarly, contains lots of public housing with a few Census tracts containing man families with children. Downtown Los Angeles has lots of public housing, but Census tracts with fewer families with children; this is also the case near the cities of West Hollywood and Beverly Hills.

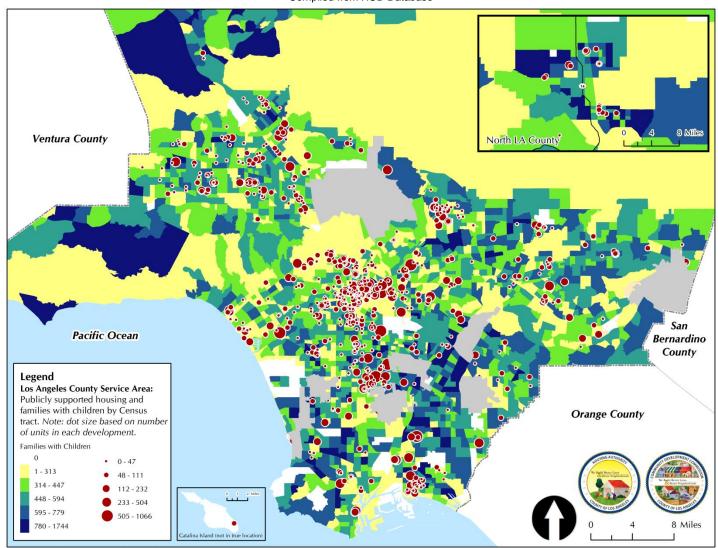
Map IV.165
Disabled Persons and Publicly Supported Housing
Los Angeles County Service Area
Compiled from HUD Database



Map IV.166
Elderly Persons and Publicly Supported Housing
Los Angeles County Service Area
Compiled from HUD Database



Map IV.167
Family Status and Publicly Supported Housing
Los Angeles County Service Area
Compiled from HUD Database



R/ECAPS & PUBLICLY SUPPORTED HOUSING COMPARISON

In Map IV.75 below, occupied housing units are shown by publicly supported housing program category and split by R/ECAP tracts and non-R/ECAP tracts. Hispanics constituted over half of public housing units in both R/ECAP and non-RECAP Census tracts. Black residents comprised a much larger percentage of the housing units in R/ECAP tracts (35.6 percent) than in non-R/ECAP tracts (only 18.5 percent). One of the largest disparities within protected class from R/ECAP to non-R/ECAP occurs among White residents living in Other HUD Multifamily housing: only seven percent of all residents living in this category of public housing in R/ECAP tracts were White, while 35 percent living in non-R/ECAP tracts were white.

Housing units occupied by families with children were the majority in R/ECAP tracts for public housing only, but constituted large percentages in non-R/ECAP public housing (42.1 percent) and R/ECAP HCV housing (32.4 percent). Housing units occupied by elderly residents (aged 70 and older) were the vast majority in Other HUD Multifamily in both R/ECAP and non-R/ECAP tracts (94.1 and 83.3 percent, respectively). Elderly residents also occupy the majority of occupied units in both R/ECAP and non-R/ECAP tracts in Project-based Section 8 housing (58.8 and 69.8 percent, respectively). Housing units occupied by disabled residents were highest in the HCV Program, with nearly a third of all units falling in this category for both R/ECAP and non-R/ECAP tracts (31.8 and 33.7 percent, respectively).

Table IV.84

HUD AFFH Table 7 – R/ECAP and Non-R/ECAP Demographics by Housing Program

Los Angeles County Service Area

Compiled from HUD Database

	Total Occupied Units	% White	% Black	% Hispanic	% Asian	% Families with children	% Elderly	% with a disability
Public Housing R/ECAP tracts Non R/ECAP	4,809 5,007	2.1% 11.8%	35.6% 18.5%	59.7% 65.3%	2.6% 4.4%	59.0% 42.1%	21.1% 37.9%	12.4% 16.2%
Project-based Sec R/ECAP tracts Non R/ECAP tracts	4,615 27,973	9.9% 23.3%	29.4% 18.5%	32.2% 28.2%	28.3% 29.7%	22.5% 14.9%	58.8% 69.8%	11.8% 12.8%
Other HUD multifa R/ECAP tracts Non R/ECAP tracts	735 3,652	7.0% 35.0%	20.9% 7.0%	34.6% 18.7%	37.5% 39.0%	0.0% 0.6%	94.1% 83.3%	8.4% 16.3%
HCV Program R/ECAP tracts Non R/ECAP tracts	10,991 67,371	8.3% 21.3%	64.7% 47.1%	18.9% 25.0%	7.7% 6.4%	32.4% 29.7%	28.6% 35.5%	31.8% 33.7%

DEMOGRAPHIC COMPOSITION OF PUBLIC HOUSING PROPERTIES

For public housing in the service area, the highest occupancy percentage of White residents can be found at West Knoll Et Al / Palm in the Urban County, which is 78 percent White. ⁹⁶ The only other public housing development with more than 50 percent of White residents is Marina Manor I, of Los Angeles, with 57 percent White residents. These developments are outliers when compared to other occupancy percentages for White residents: 28 of the 36

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⁹⁵ As this table was generated from the AFFH Online Mapping tool, no data was available for the non-entitlement cities of Artesia, Bradbury, Hidden Hills, Industry, Palos Verdes Estates, Rolling Hills, and Vernon.

⁹⁶ For tables containing demographic data compiled from HUD's Online Mapping Tool, see Technical Appendix Section VI.

public housing developments in the service area contain less than 10 percent White residents.⁹⁷ The highest occupancy percentage of Black residents can be found in South Bay Gardens in Los Angeles, with an 80 percent occupancy rate. Only 15 of the 36 public housing developments contain less than 10 percent of Black residents.

In the City of Los Angeles, five housing developments have 90 percent or higher occupancy of Hispanic residents: Jordan Scattered, New Pico Gardens Phase ii, Estrada Courts, Ramona Gardens, and San Fernando Gardens. No public housing developments contain less than 10 percent of Hispanic residents, and 21 of the 36 developments contain more than 50 percent Hispanic residents. Only seven of the developments contain greater than 10 percent Asian residents, with the largest, McNeill Manor in Baldwin Park, containing 25 percent Asian residents. Wilmington Townhomes of Los Angeles contains the highest proportion of households with children, with 94 percent of the households in that development. 24 of the public housing developments contain greater than one-third of households with children.

For Project-Based Section 8 housing in the service area, the highest occupancy percentage of White residents can be found at Valverde, Menorah Terrace, and Village Acquisition, all of which are 100 percent White. Of the 536 Section 8 housing developments, 84 contain greater than 50 percent White residents. The highest occupancy percentage of Black residents can be found in a development called Mca#3 Apartments in Los Angeles, with 100 percent of Black residents. 100 of the 536 Section 8 developments in the service area contain more than 50 percent Black residents. Four Section 8 developments contain 100 percent Hispanic residents: Kernwood Terrace, Lankership Arms, Laurel Canyon Terrace, and Imogene Housing. Fully 474 of the developments contain greater than 50 percent Hispanic residents. Only New Hampshire Arms in Los Angeles contain 100 percent Asian residents, and only 82 of the Section 8 housing developments contain greater than 50 percent Asian residents. Sierra Villa East in Lancaster contains the largest percent of families with children, at 84 percent; families with children comprise over half the households in 97 of the 536 developments in Section 8.

For other HUD multifamily developments, the highest occupancy percentage of White residents can be found at Golden Years Senior Apartments in Los Angeles, which is 96 percent White. Of the 145 developments of this category, 38 contain greater than 50 percent White residents. The highest occupancy percentage of Black residents can be found in a development called Carter House, 85 percent Black; only five of the developments contain more than 50 percent Black residents, and all of them are located in Los Angeles. The Villa Malaga Housing Corporation contains 100 percent Hispanic residents, and nine of the 145 other HUD multifamily developments contain more than 50 percent Hispanic residents. The Telacu Monterey Park Plaza in Monterey Park contains the highest percentage of Asian residents in the service area, at 100 percent, and 26 of the developments contain more than 50 percent of Asian residents. Only 11 of the developments had a percentage listed for households of families with children, the largest of which contain 30 percent (Santa Monica New Hope Apartments). Seven of the 11 developments contain more than ten percent of households with families with children.⁹⁸

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⁹⁷ Compiled from HUD AFFH database. Does not include non-entitlement cities of Artesia, Bradbury, Hidden Hills, Industry, Palos Verdes Estates, Rolling Hills, and Vernon.

⁹⁸ No RAD properties found in the service area and no demographic data found on LIHTC developments.

According to the Housing Authority of the County of Los Angeles, the only property converted under RAD is Jasmine Gardens in Compton. This property is not in the Los Angeles County Service Area.

ADDITIONAL OCCUPANCY INFORMATION

No additional information to report.

OCCUPANT DEMOGRAPHIC COMPARISON BY CATEGORY

Menorah Terrace in West Hollywood is Project-based Section 8 housing which contain among the highest percentage of White residents (fully 100 percent), along with Valverde in Los Angeles. Other public housing occupied by more than 90 percent of White residents is located in Santa Monica and El Monte. Of these cities named, none have more than 70 percent of White residents (Santa Monica). There are 197 developments with White occupancy levels greater than the proportion of White residents living in the service area (27.6 percent of the service area population is White). These developments (27.5 percent of all developments in the service area) contain an over-representation of White residents compared with the service area population.

Public housing developments with the largest percentage of Black residents include Market Park Apartments in Inglewood (98 percent Black), Alice Manor in Los Angeles (95 percent Black), and Sonya Gardens in Los Angeles (95 percent Black). There are 298 developments with Black occupancy levels greater than the proportion of Black residents living in the service area. (8.4 percent of the service area population is Black). These developments (41.6 percent of all developments in the service area) contain an over-representation of Black residents compared with the service area population.

Several housing developments in the service area contain 100 percent Hispanic residents: Kernwood Terrace in East Los Angeles, Laurel Canyon Terrace near San Fernando, Lankershim Arms in North Hollywood, and Villa Malaga Apartments in East Los Angles. The service areawide Hispanic percentage is 47.4, and there are 167 developments that exceed this level, indicating an over-representation in 23.3 percent of the housing developments.

Two housing developments are fully occupied with Asian residents: Telacu Monterey Park Plaza in Monterey Park and New Hampshire Apartments in Los Angeles. 14.2 percent of the service area population is Asian, and with 207 public housing developments exceeding this threshold, there is an over-representation of Asian residents in 28.9 percent of the total developments in the service area.

The West Knoll development, in the Urban County, has the highest percentage occupancy by White residents, but it is not clear where specifically this development is located. South Bay Gardens, containing 80 percent Black residents, has the highest such percent of public housing developments in the service area, and is located in a Census tract with 61.4 percent Black residents. New Pico Gardens and Estrada Courts contain the highest concentrations of Hispanic residents, with each being 93 percent Hispanic, and both are located in Census tracts with a high percentage of Hispanic residents: 79.3 and 95.1 percent, respectively. Mcneill Manor in

Baldwin Park has the highest concentration of Asian residents in the service area, with 25 percent Asian residents. Baldwin Park, to compare, has only 14.1 percent of Asian residents.

Section 8 developments Menorah Terrace and Valverde contain 100 percent White residents, located in West Hollywood and Reseda, respectively. These developments are located respectively in Census tracts with 84.4 percent and 54.2 percent White residents. The Section 8 development with the highest concentration of Black residents, MCA3 Apartments in Los Angeles, contains 100 percent Black residents. This development is located in a Census tract with 49.5 percent Black residents. Hispanic residents constituted 100 percent of the occupancy of the following Section 8 developments: Kernwood Terrace (Los Angeles), Laurel Canyon Terrace (Pacoima), Imogene Terrace (Los Angeles), and Lankershim Arms (West Hollywood). The four developments are located in Census tracts with the following respective Hispanic population concentrations: 98.1, 93.0, 51.0, and 78.8 percent Hispanic. The highest occupancy by Asian residents in Section 8 housing occurred in New Hampshire Arms development just west of Koreatown (100 percent Asian residents), located in a Census tract with 52.3 percent Asian residents.

In the other HUD multifamily category, the development with the highest occupancy rate of White residents is Golden Years Senior Apartments, located in the NoHo arts district of Los Angeles. The development is comprised of 96 percent of White residents, but is located in a Census tract with only 57.9 percent White residents. The development with the highest percentage of Black residents is the Carter House with 85 percent Black residents and is located in South Los Angeles, in a Census tract with only 23.3 percent Black residents. The Villa Malaga Apartments in East Los Angeles is 100 percent Hispanic, which corresponds closely with the Census tract in which it is located, which is 98.1 percent Hispanic. Finally, the Telacu Monterey Park Plaza in Monterey Park contains the highest percentage of Asian residents in the service area, at 100 percent, and is located in a Census tract comprised of 79 percent Asian residents.

There are 289 total developments containing households with children, and 126 of these contain developments exceeding the service area average (47.8 percent). Thus, there is an over-representation of households with children in 17.8 percent of public housing developments in the service area, the lowest of the protected classes. Of all the public housing categories, other HUD multifamily contains the highest percentage of the elderly, with 94.1 percent of these developments in R/ECAP Census tracts containing elderly residents. Disabled residents are represented most in within the HCV program (over 30 percent disabled) and in both public housing and other HUD multifamily housing (roughly 16 percent disabled).

DISPARITIES IN ACCESS TO OPPORTUNITY FOR PUBLICLY SUPPORTED HOUSING RESIDENTS

The following section analyzes disparities in access to opportunity for residents living in different public housing program categories. While data is not available to show all publicly-supported housing residents by family status, elderly, and disabilities, HCV data does show elderly and disabled status, so these are mapped along with each opportunity index.

Residents living in public housing largely live in neighborhoods of low environmental quality with the exception of those developments in northern LA County (see Map IV.168 on page

328). For the most part, these residents live in and near the largest grouping of R/ECAPs in central and South-Central LA and near Long Beach. Similarly, residents using low income housing tax credits (LIHTCs) in the service area largely live in neighborhoods of low environmental quality (see Map IV.169 on page 329), aligning closely with R/ECAP areas. The largest grouping of residents using LIHTCs in areas with higher index values occurs in Lancaster and Palmdale in northern LA County. The same general trend was true for residents using housing choice vouchers (HCVs), with the majority of these residents living in areas of low environmental quality, with a significant grouping living in areas with much higher environmental quality around Lancaster and Palmdale (see Map IV.170 on page 330). HCV residents tend not to live in R/ECAP neighborhoods, aside from Lancaster/Palmdale.

The disabled population using HCVs is found mostly in the central portion of the County in areas of low environmental quality (see Map IV.171 on page 331). The exception is in northern LA County, where disabled residents using HCVs live with above average environmental quality. The elderly population using HCVs is similarly dispersed (but less densely so), with large groupings in areas with relatively low environmental quality except near Lancaster and Palmdale to the north (see Map IV.172 on page 332).

Public housing developments both large and small are mainly concentrated in neighborhoods with high levels of transit use, with the only exception being near Lancaster and Palmdale, where a small handful of public housing is near moderate transit use (see Map IV.173 on page 333). Residents with LIHTCs live almost exclusively in neighborhoods with high levels of transit use in Los Angeles, Santa Monica, and Long Beach (see Map IV.174 on page 334); however, residents using HCVs tend to live further in the eastern portions of Los Angeles County with slightly lower levels of transit use (see Map IV.175 on page 335). Disabled HCV residents tend to live in areas with high transit use (see Map IV.176 on page 336), while elderly HCV residents live further away from these high-transit neighborhoods (see Map IV.177 on page 337).

The trends evident with high transit use corresponded very closely with low transportation costs, as shown beginning with Map IV.178 on page 338. Residents living in public housing and utilizing LIHTCs lived in areas with lower transportation cost, while residents using HCVs living in eastern LA County did not have quite as low of transportation costs (but still very low overall – see Map IV.186 on page 346). The disabled HCV population aligned closely with neighborhoods with the lowest transportation costs except for norther LA County (see Map IV.181 on page 341); similarly, elderly HCV residents tend to be grouped in areas of low transportation cost (see Map IV.182 on page 342).

Labor market engagement was generally lower in areas with large clusters of public housing, with the exception of areas west of Los Angeles, such as Beverly Hills, Santa Monica, and Culver City. Pasadena, similarly, contains a sizeable grouping of public housing in an area with higher levels of labor market engagement (see Map IV.183 on page 343). The R/ECAP neighborhoods near central LA County tend to correspond with lower levels of engagement. The majority of LIHTCs near Downtown Los Angeles are situated in areas of low labor market engagement; LIHTCs to the north near San Fernando and in the eastern portion of the County,

while in much lower density, are in areas with moderate and even high levels of engagement (see Map IV.184 on page 344).

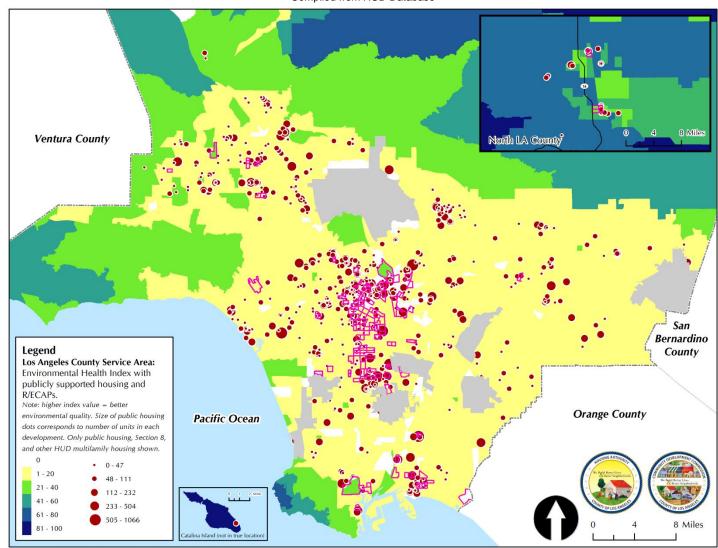
HCVs are located primarily in the eastern portion of LA County in areas with medium (and in some cases high) levels of engagement (see Map IV.185 on page 345). Much of the disabled HCV residents living in the northern portion of the County live in areas with low engagement, while clusters of disabled residents living near Santa Monica and Beverly Hills are in areas with much higher levels; residents living in norther Los Angeles and in the south and east of the County live in areas of mixed labor market engagement (see Map IV.186 on page 346). With few exceptions, the elderly population lives in areas with moderate to high levels of engagement (see Map IV.187 on page 347).

Residents living in public housing near Downtown Los Angeles were largely in neighborhoods with high levels of poverty, although some public housing near Torrance and Industry area in areas with lower levels of poverty (see Map IV.188 on page 348); this is very similar to residents with LIHTCs, with many of these residents in eastern LA County having moderate exposure to poverty (see Map IV.189 on page 349). Residents using HCVs are less exposed to poverty (Map IV.190 on page 350), living mainly in eastern LA County. Disabled HCV residents (Map IV.191 on page 351) and elderly HCV residents (Map IV.192 on page 352) have lower levels of exposure to poverty, living mainly in southeastern LA County.

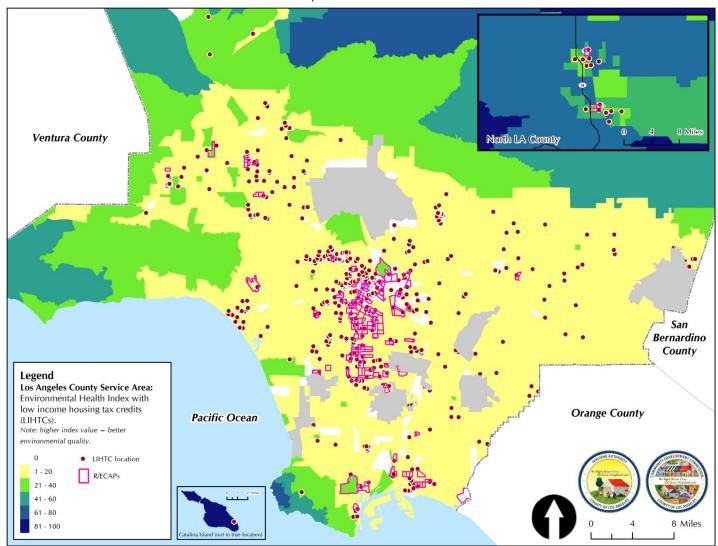
Neighborhoods with the highest levels of school proficiency are largely devoid of public housing, although there appear to be a handful of exceptions in La Crescenta-Montrose, Arcadia, Cerritos, and Torrance (Map IV.193 on page 353). Residents with LIHTCs live largely in areas with low levels of school proficiency near Downtown Los Angeles (see Map IV.194 on page 354), while significant groupings of residents with HCVs live in areas with higher levels of proficiency in eastern LA County (see Map IV.195 on page 355). Disabled and elderly HCV residents are relatively evenly dispersed throughout the service area in neighborhoods with low and high levels of school proficiency in southeastern LA County (see Map IV.196 and Map IV.197, respectively).

As the Jobs Proximity Index does not follow a discernable pattern across the service, it is not obvious whether the protected classes discussed here follow any particular trend of high or low levels of proximity to employment centers (this opportunity index map series begins with Map IV.198 on page 358).

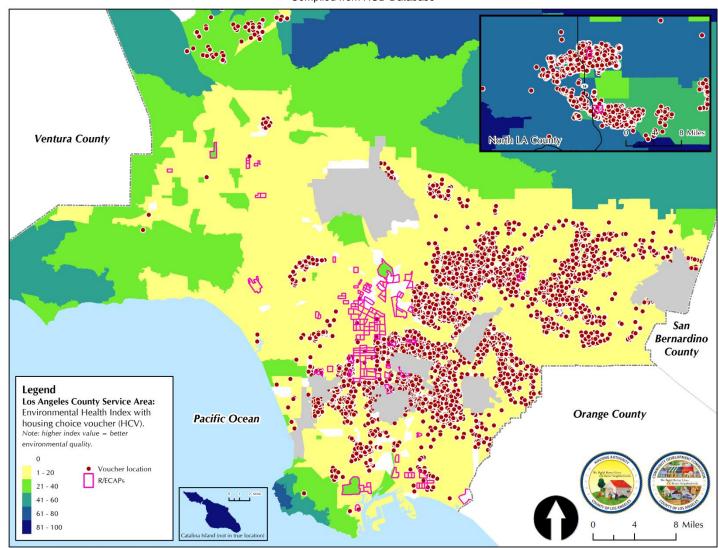
Map IV.168
Public Housing & R/ECAPs with Environmental Health Index
Los Angeles County Service Area
Compiled from HUD Database



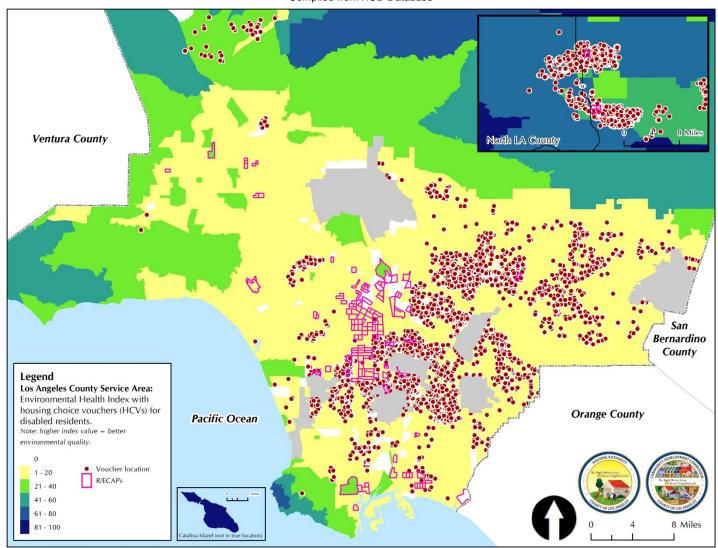
Map IV.169
LIHTCs & R/ECAPs with Environmental Health Index
Los Angeles County Service Area
Compiled from HUD Database



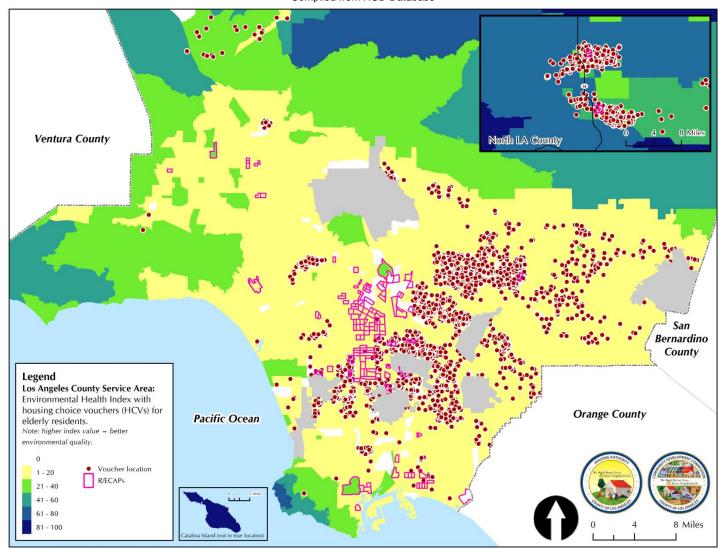
Map IV.170
HCVs & R/ECAPs with Environmental Health Index
Los Angeles County Service Area
Compiled from HUD Database



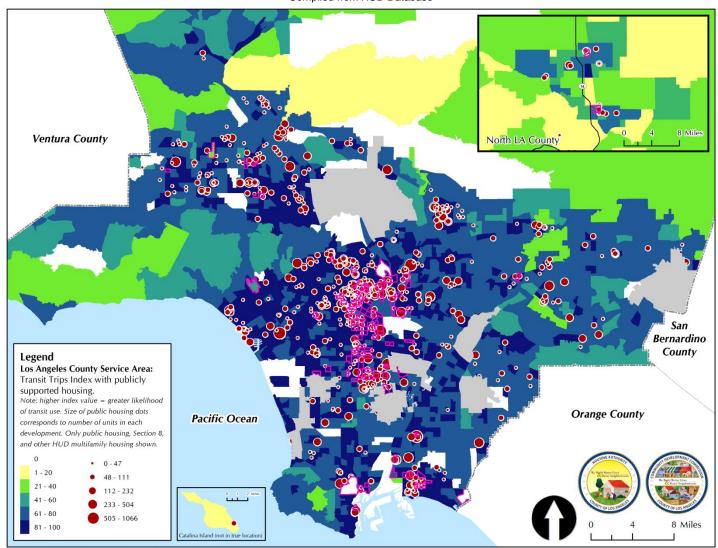
Map IV.171
Disabled HCV Population with Environmental Health Index
Los Angeles County Service Area
Compiled from HUD Database



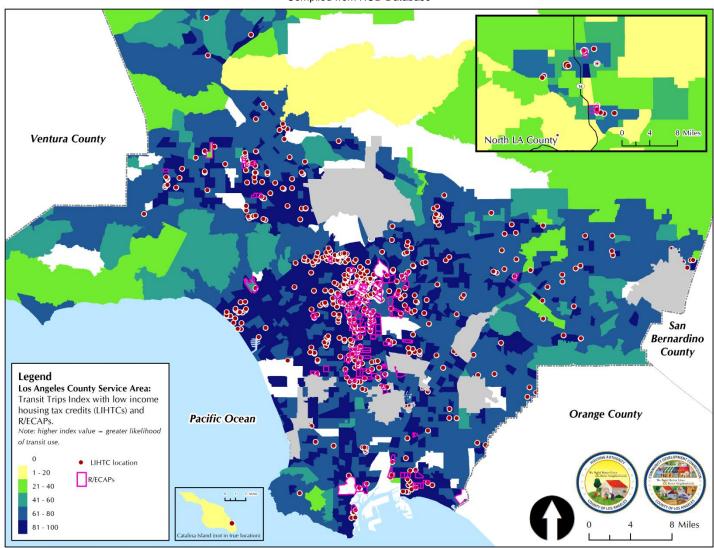
Map IV.172
Elderly HCV Population with Environmental Health Index
Los Angeles County Service Area
Compiled from HUD Database



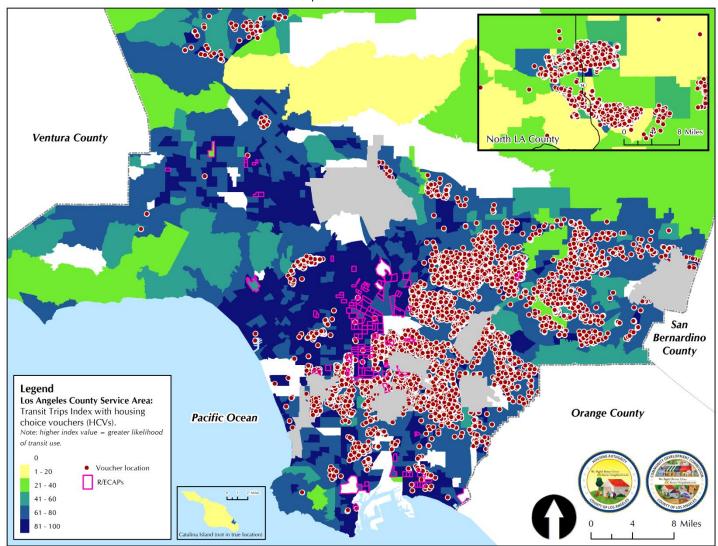
Map IV.173
Public Housing & R/ECAPs with Transit Trips Index
Los Angeles County Service Area
Compiled from HUD Database



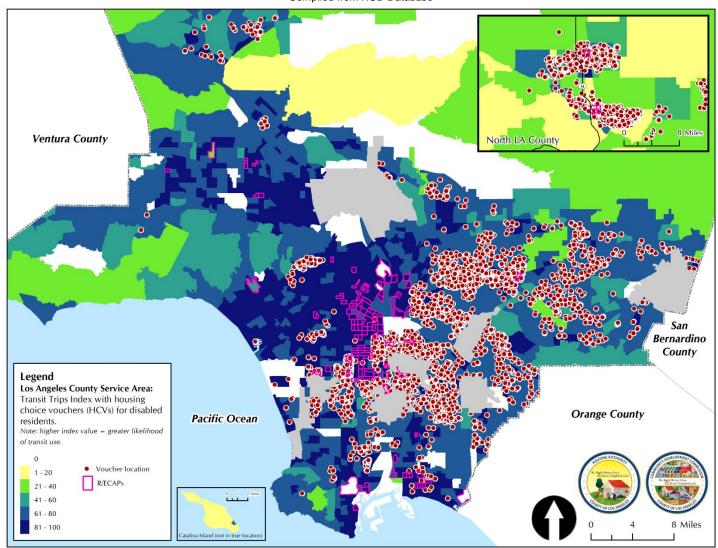
Map IV.174
LIHTCs & R/ECAPs with Transit Trips Index
Los Angeles County Service Area
Compiled from HUD Database



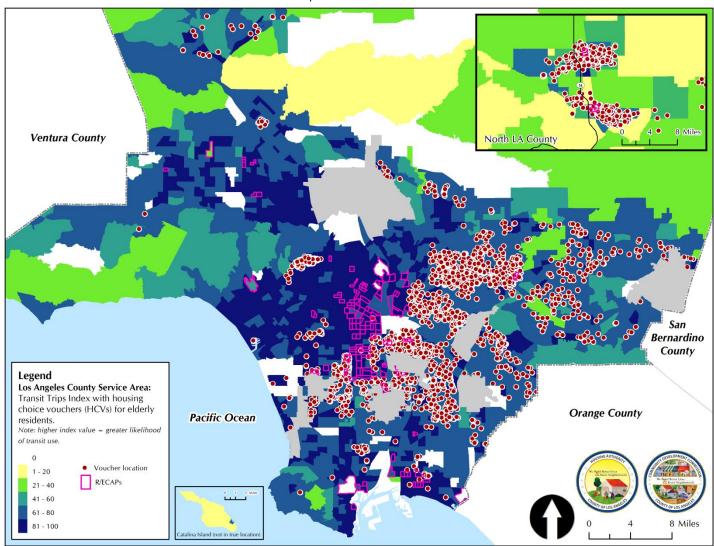
Map IV.175
HCVs & R/ECAPs with Transit Trips Index
Los Angeles County Service Area
Compiled from HUD Database



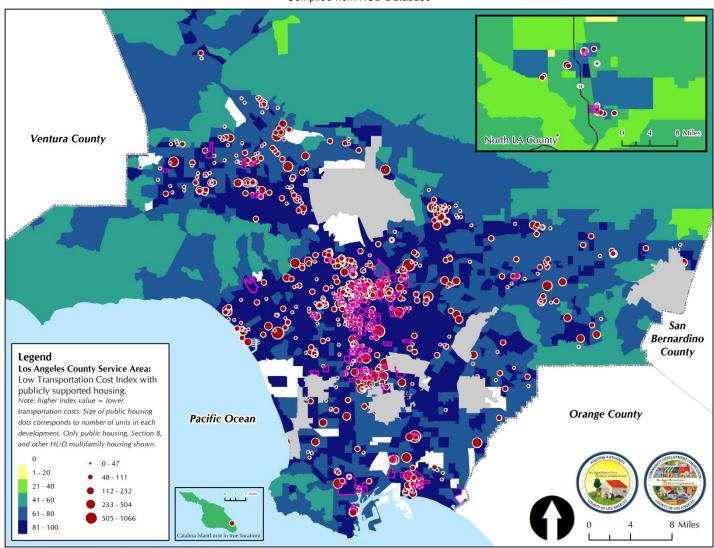
Map IV.176
Disabled HCV Population with Transit Trips Index
Los Angeles County Service Area
Compiled from HUD Database



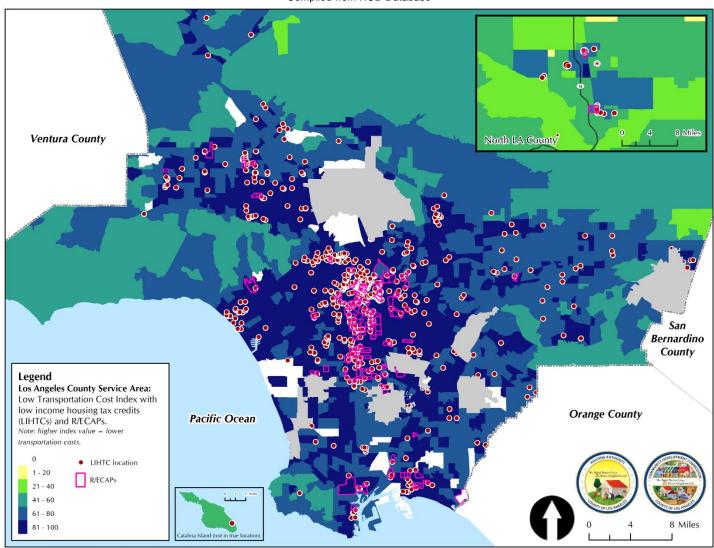
Map IV.177 Elderly HCV Population with Transit Trips Index Los Angeles County Service Area Compiled from HUD Database



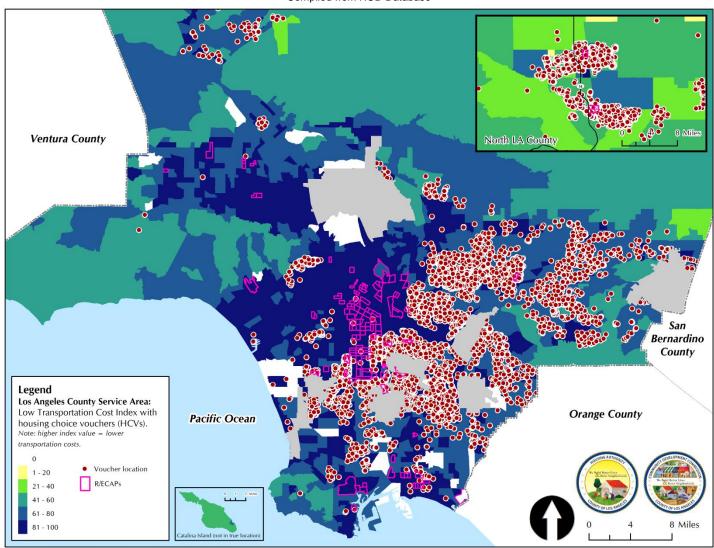
Map IV.178
Public Housing & R/ECAPs with Low Transportation Cost Index
Los Angeles County Service Area
Compiled from HUD Database



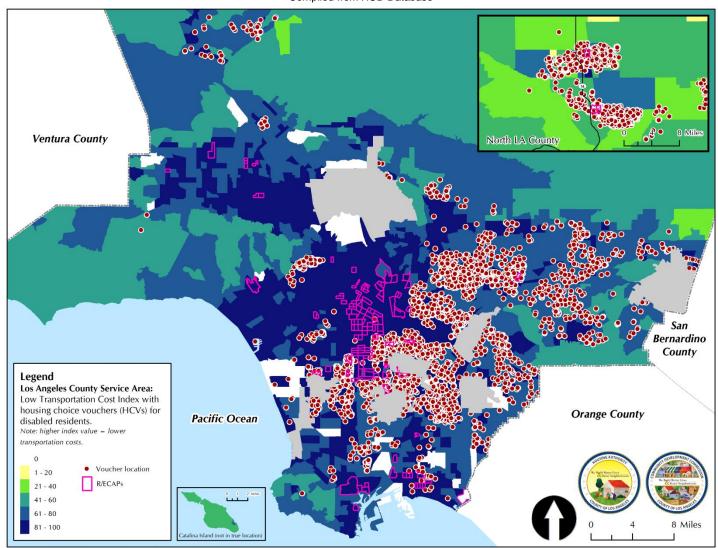
Map IV.179 LIHTCs & R/ECAPs with Low Transportation Cost Index Los Angeles County Service Area Compiled from HUD Database



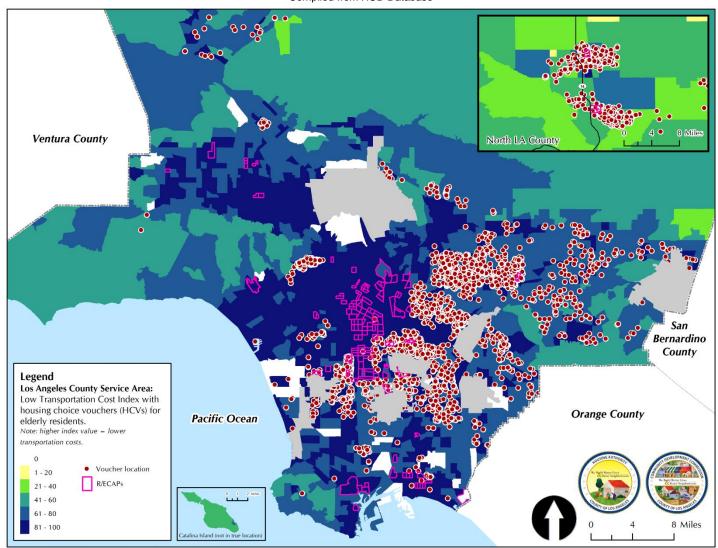
Map IV.180
HCVs & R/ECAPs with Low Transportation Cost Index
Los Angeles County Service Area
Compiled from HUD Database



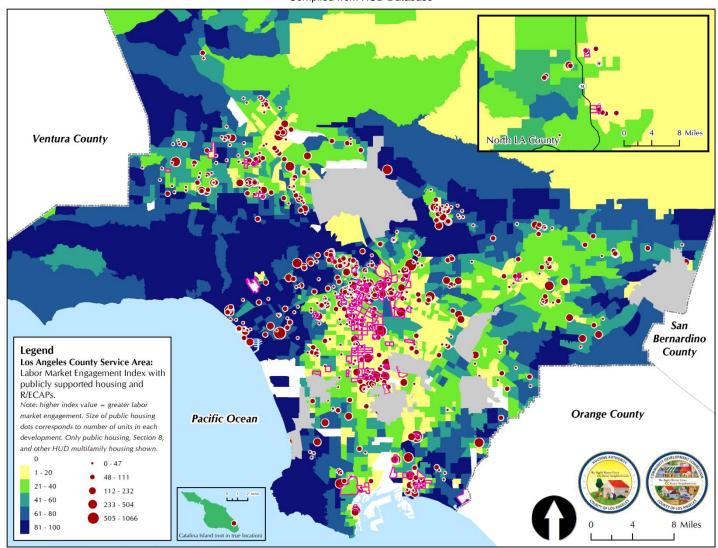
Map IV.181
Disabled HCV Population with Low Transportation Cost Index
Los Angeles County Service Area
Compiled from HUD Database



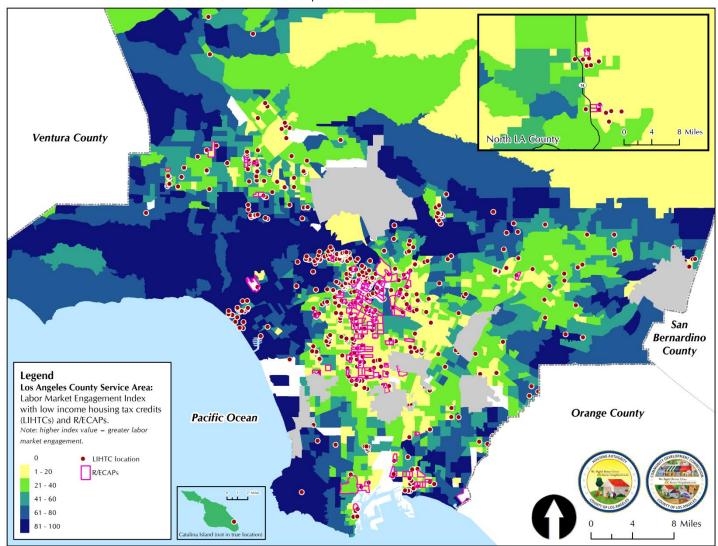
Map IV.182
Elderly HCV Population with Low Transportation Cost Index
Los Angeles County Service Area
Compiled from HUD Database



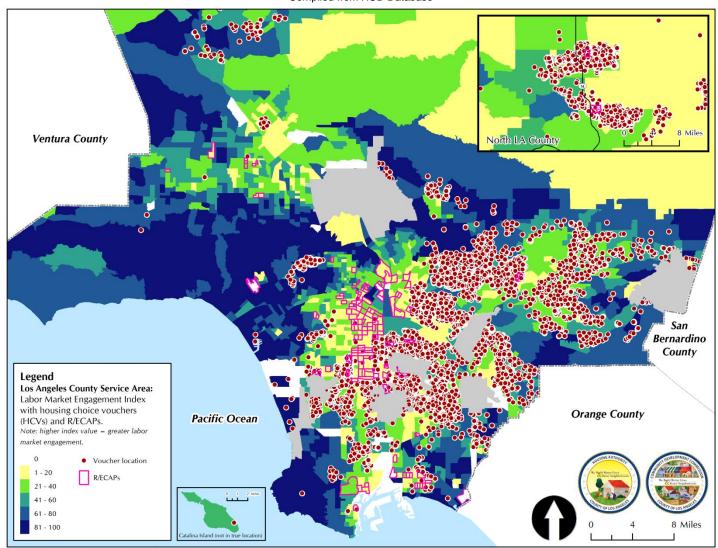
Map IV.183
Public Housing & R/ECAPs with Labor Market Engagement Index
Los Angeles County Service Area
Compiled from HUD Database



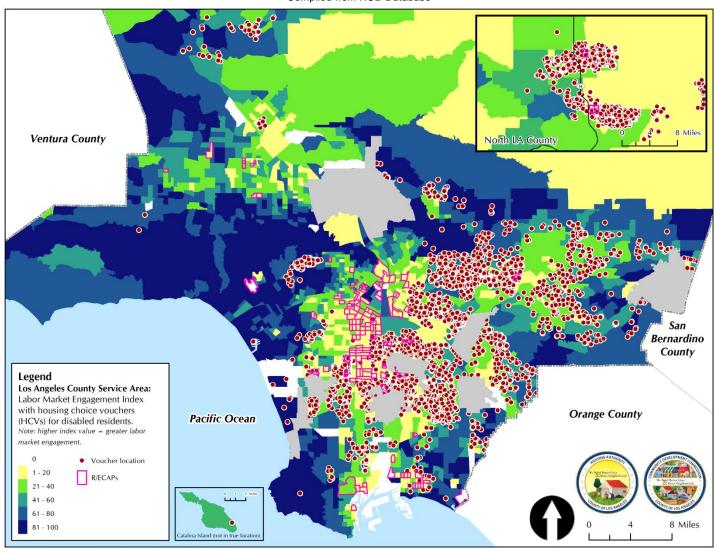
Map IV.184
LIHTCs & R/ECAPs with Labor Market Engagement Index
Los Angeles County Service Area
Compiled from HUD Database



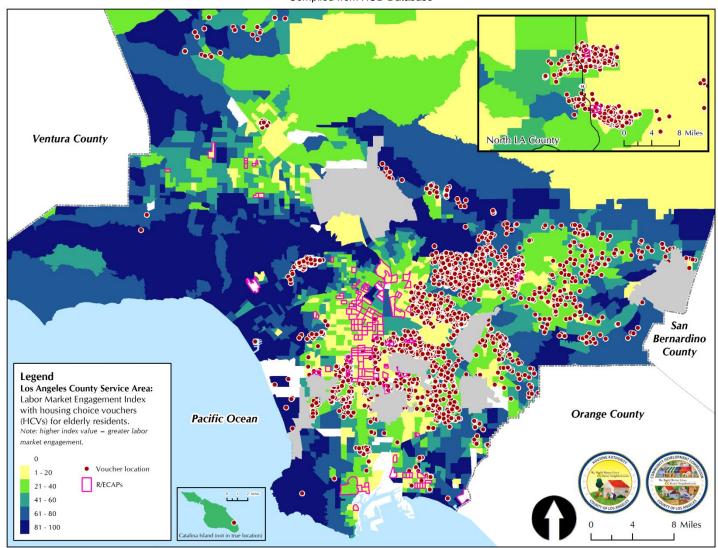
Map IV.185
HCVs & R/ECAPs with Labor Market Engagement Index
Los Angeles County Service Area
Compiled from HUD Database



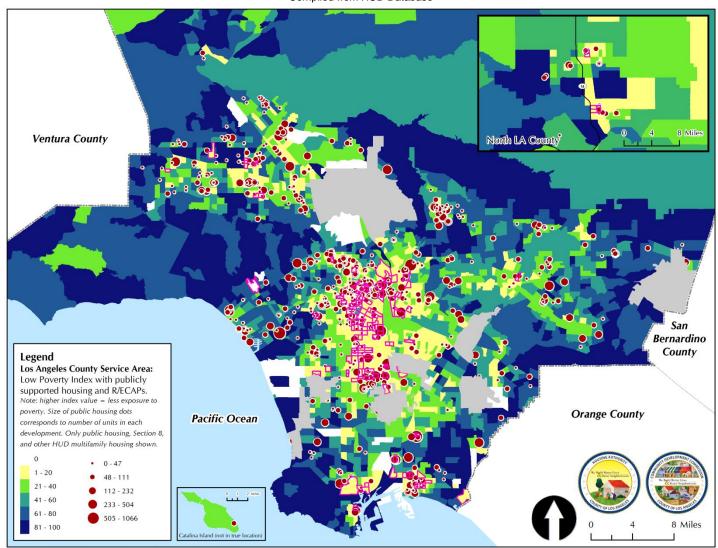
Map IV.186
Disabled HCV Population with Labor Market Engagement Index
Los Angeles County Service Area
Compiled from HUD Database



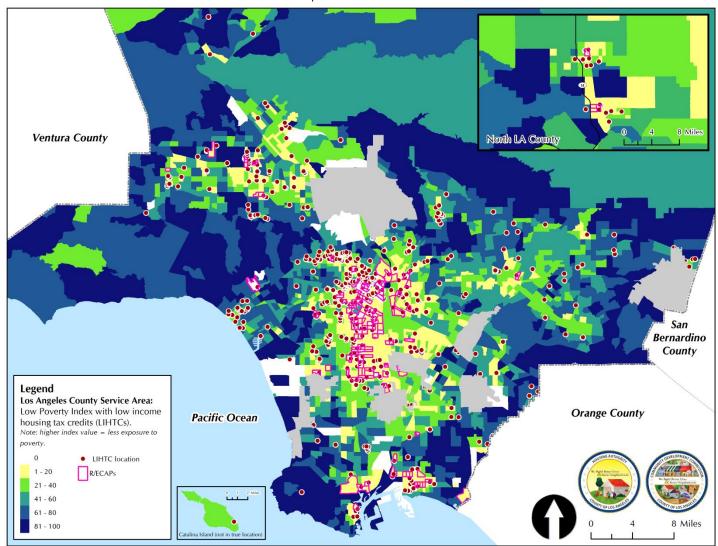
Map IV.187
Elderly HCV Population with Labor Market Engagement Index
Los Angeles County Service Area
Compiled from HUD Database



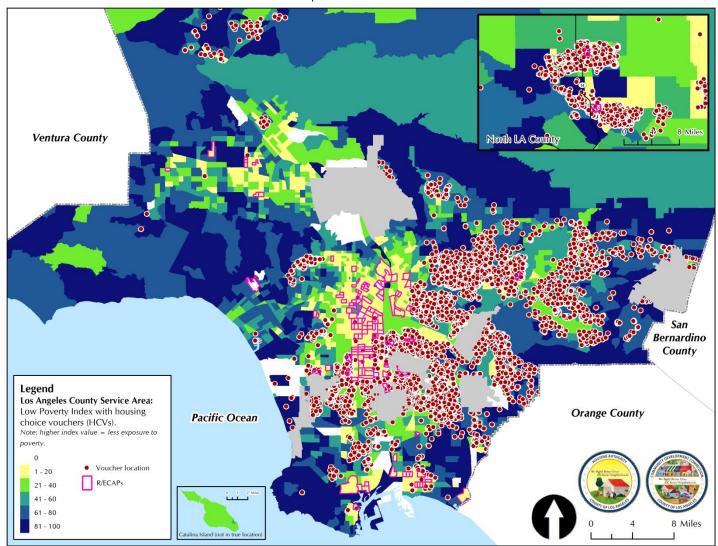
Map IV.188
Public Housing & R/ECAPs with Low Poverty Index
Los Angeles County Service Area
Compiled from HUD Database



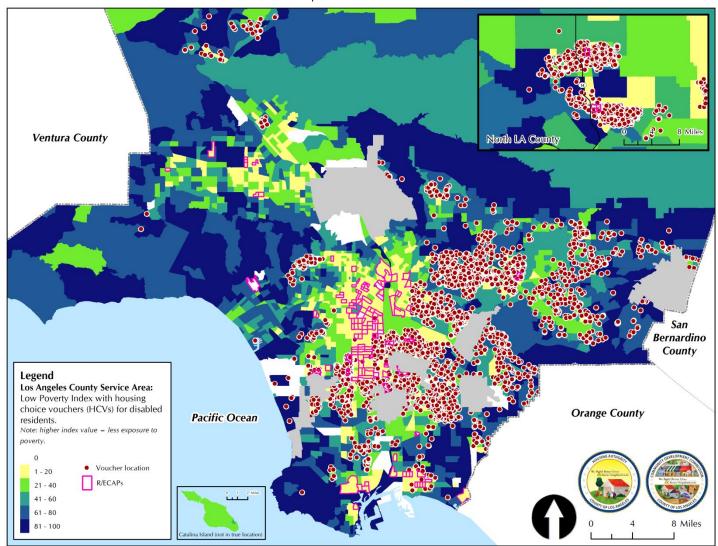
Map IV.189 LIHTCs & R/ECAPs with Low Poverty Index Los Angeles County Service Area Compiled from HUD Database



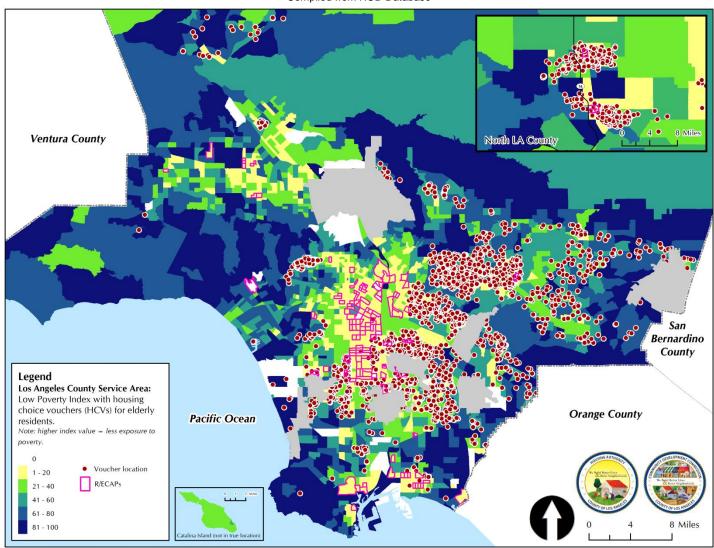
Map IV.190 HCVs & R/ECAPs with Low Poverty Index Los Angeles County Service Area Compiled from HUD Database



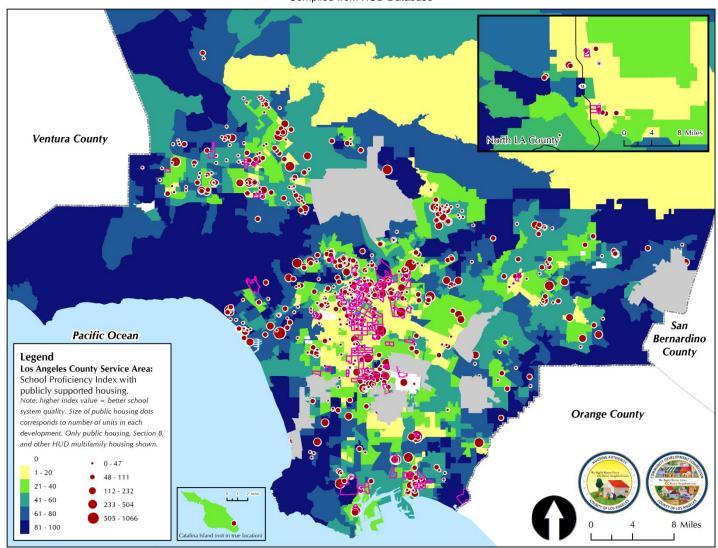
Map IV.191
Disabled HCV Population with Low Poverty Index
Los Angeles County Service Area
Compiled from HUD Database



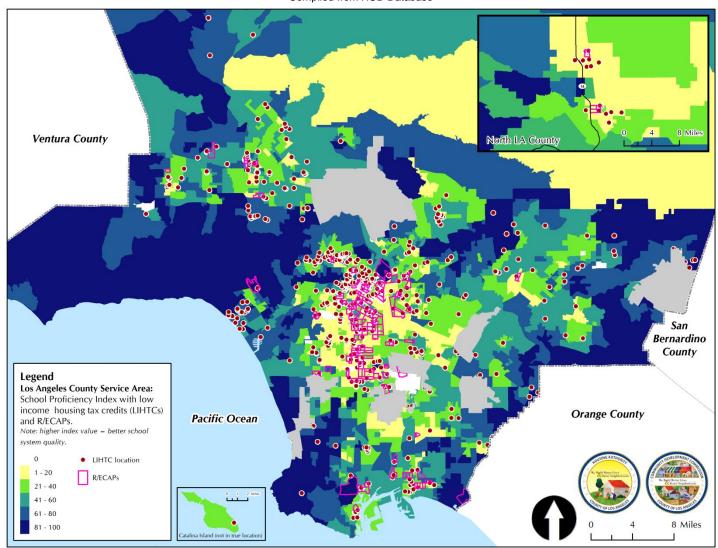
Map IV.192 Elderly HCV Population with Low Poverty Index Los Angeles County Service Area Compiled from HUD Database



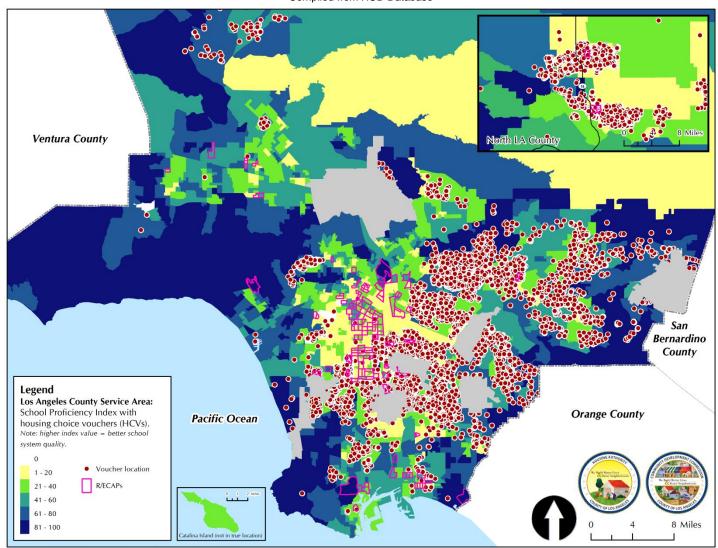
Map IV.193
Public Housing & R/ECAPs with School Proficiency Index
Los Angeles County Service Area
Compiled from HUD Database



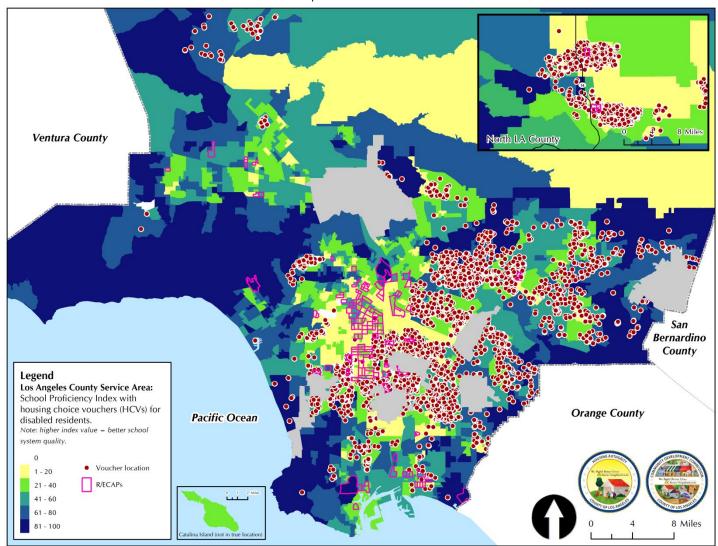
Map IV.194
LIHTCs & R/ECAPs with School Proficiency Index
Los Angeles County Service Area
Compiled from HUD Database



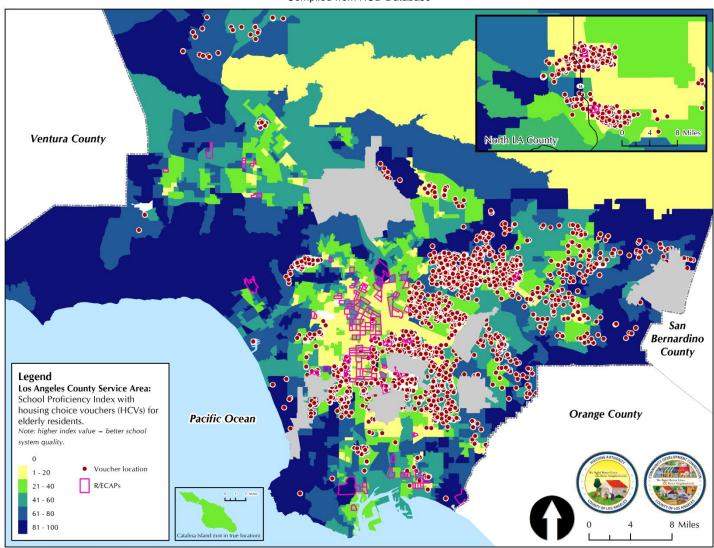
Map IV.195 HCVs & R/ECAPs with School Proficiency Index Los Angeles County Service Area Compiled from HUD Database



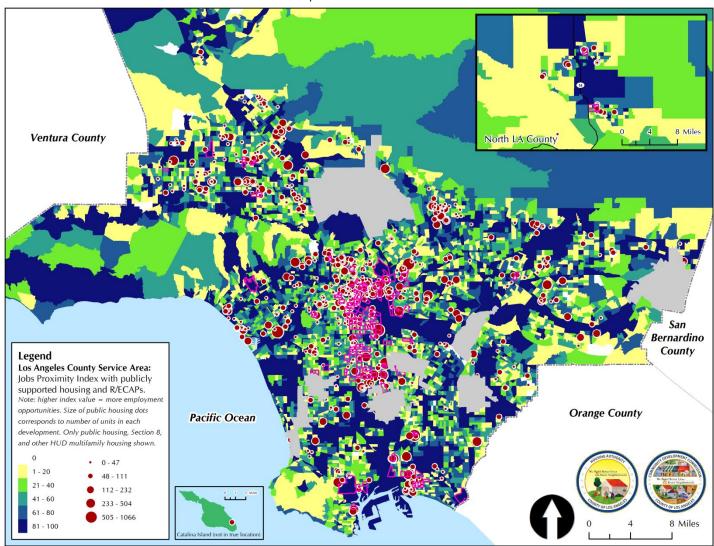
Map IV.196
Disabled HCV Population with School Proficiency Index
Los Angeles County Service Area
Compiled from HUD Database



Map IV.197
Elderly HCV Population with School Proficiency Index
Los Angeles County Service Area
Compiled from HUD Database

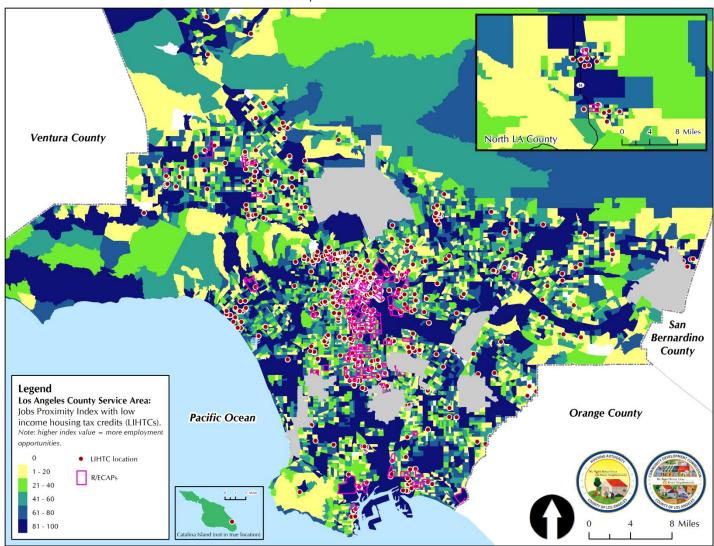


Map IV.198
Public Housing & R/ECAPs with Jobs Proximity Index
Los Angeles County Service Area
Compiled from HUD Database

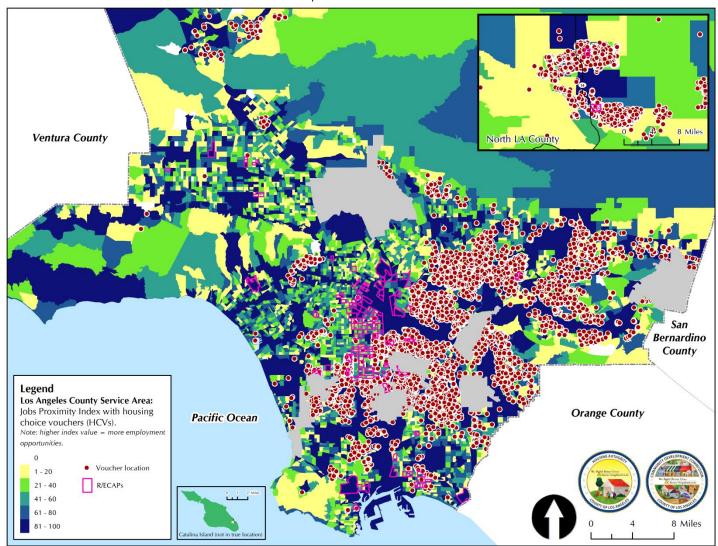


Map IV.199
LIHTCs & R/ECAPs with Jobs Proximity Index

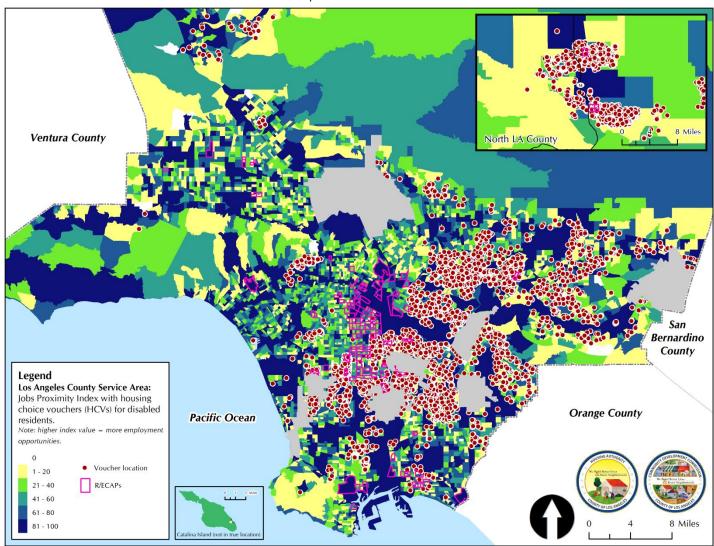
Los Angeles County Service Area Compiled from HUD Database



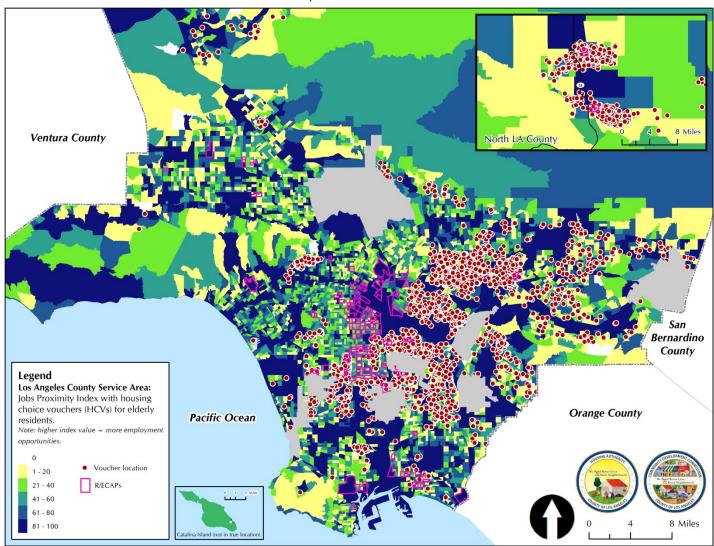
Map IV.200 HCVs & R/ECAPs with Jobs Proximity Index Los Angeles County Service Area Compiled from HUD Database



Map IV.201
Disabled HCV Population with Jobs Proximity Index
Los Angeles County Service Area
Compiled from HUD Database



Map IV.202 Elderly HCV Population with Jobs Proximity Index Los Angeles County Service Area Compiled from HUD Database



ADDITIONAL INFORMATION

Select results from the 2017 Resident Fair Housing Survey are shown below by public housing residents and Section 8 residents. Further breakdowns of this data into R/ECAP neighborhood, HACoLA service area, and Urban County service area can be found later in this document. For a full report of survey results, see Technical Appendix Volume II.

A total of 552 respondents living in public housing responded to the survey and, regarding perceptions of safety, only 10 percent felt unsafe walking around the neighborhood during the day, while closer to 30 percent felt unsafe at night. In general, respondents felt slightly safer in their public housing developments, both at night and during the day, than in their neighborhood as evidenced by Table IV.85 below. When walking at night, just over 40 percent of respondents feel either safe or very safe.

Table IV.85
Perceptions of Safety
Residents Residing in Public Housing
Fair Housing Survey

Response	Not safe	Somewhat Safe	Safe	Very Safe	Does Not Apply	Missing	Total
How safe would you say you fell walking in your neighborhood during the day time?	51	131	220	146		4	552
How safe would you say you feel walking in your neighborhood at night?	149	168	155	69		11	552
How safe would you say you feel walking in your public housing development during the day time?	36	108	211	162	17.	18	552
How safe would you say you feel walking in your public housing development at night?	111	160	165	71	27.	18	552

Most respondents (413 total, or nearly 75 percent) had not been displaced from their housing in the past 10 years, but just over 10 percent had. Of these respondents, most had been displaced as a renter, with only 6 of the 552 respondents having been displaced as a homeowner.

Table IV.86
Have you been displaced from your housing within the last 10 years?

Residents Residing in Public Housing Fair Housing Survey

Displaced	Responses
Yes, as a renter	51
No, as a renter	399
Yes, as an owner	6
No, as an owner	14
Don't remember	45
Missing	37
Total	552

Of the respondents to claim housing discrimination in the survey, most of them were on the basis of race/ethnicity, with disability and income being the second most-common grounds for discrimination. The least common reasons for discrimination for residents in public housing include ancestry, religion, and pregnancy or family status.

Table IV.87

Do you believe that you have been discriminated against in your housing because of any of the following (Check all that apply):

Residents Residing in Public Housing
Fair Housing Survey

Category	Responses
Race/ethnicity	37
Religion	4
Disability	17
Sexual Orientation	5
Pregnant or having children	4
Sex/Gender	6
Age	13
Marital Status	7
National Origin	7
Ancestry	3
Familial Status	10
Criminal History/Record	6
Source of income	17

Thirty-two residents had filed fair housing complaints and, curiously, fifty-one residents had been satisfied with the outcome. Given the nature of the question order, it might be safe to assume most of the residents who did file a complaint were satisfied with the outcome, although this conclusion cannot be verified with the data below.

Table IV.88
Fair Housing Complaints
Residents Residing in Public Housing

Residents Residing in Public Housing Fair Housing Survey

Complaints	Yes	No	Don't Know	Does Not Apply	Missing	Total
If you have ever been discriminated by your landlord, did you complain?	32	202	20	212	86	552
Were you satisfied with the outcome?	51	61	20	248	172	552

For total residents living in Section 8 housing,⁹⁹ 152 out of 1,176 felt unsafe when walking during their neighborhood during the day and doubling to 360 feeling unsafe at night. Fewer respondents felt unsafe in their public housing developments during the day and night, as shown below in Table IV.89. Nearly 50 percent of respondents felt either safe or very safe walking in their public housing development during the day time, and this number dips to around 38 percent at night.

Table IV.89
Perceptions of Safety
Section 8 overall

Fair Housing Survey

Response	Not safe	Somewhat Safe	Safe	Very Safe	Does Not Apply	Missing	Total
How safe would you say you fell walking in your neighborhood during the day time?	152	295	387	317		25	1,176
How safe would you say you feel walking in your neighborhood at night?	360	329	283	176		28	1,176
How safe would you say you feel walking in your public housing development during the day time?	87	171	273	311	243.	91	1,176
How safe would you say you feel walking in your public housing development at night?	177	185	239	211	256.	108	1,176

⁹⁹ This figure includes multi-family Section 8, tenant-based Section 8, and project-based Section 8 housing.

Fully 234 respondents (or almost 20 percent) had been displaced from their housing in the last 10 years and, much like public housing respondents, the bulk of this number were renters. Nearly 66 percent had not been displaced at all, either as a renter or home owner. This number is much lower than the 75 percent who had not been displaced living in public housing.

Table IV.90
Have you been displaced from your housing within the last 10 years?

Section 8 overall Fair Housing Survey

	3 7
Displaced	Responses
Yes, as a renter	213
No, as a renter	740
Yes, as an owner	21
No, as an owner	34
Don't remember	77
Missing	91
Total	1,176

Like respondents in the public housing survey, the majority of Section 8 respondents claiming to be victims of some form of housing discrimination said the basis was race/ethnicity. The next most-common forms of discrimination included source of income (86), disability (62), and age (31).

Table IV.91

Do you believe that you have been discriminated against in your housing because of any of the following (Check all that apply):

Section 8 overall Fair Housing Survey

Category	Responses
Race/ethnicity	114
Religion	24
Disability	62
Sexual Orientation	23
Pregnant or having children	8
Sex/Gender	22
Age	31
Marital Status	17
National Origin	9
Ancestry	5
Familial Status	17
Criminal History/Record	15
Source of income	86

According to Table IV.92 below, 130 respondents had been discriminated against and subsequently filed a fair housing complaint, while 413 felt the question did not apply to them. Similar to the residents in public housing, more respondents answered 'yes' to being satisfied with the outcome than actually claimed to have filed a fair housing complaint.

Table IV.92 Fair Housing Complaints

Section 8 overall Fair Housing Survey

Complaints	Yes	No	Don't Know	Does Not Apply	Missing	Total
If you have ever been discriminated by your landlord, did you complain?	130	440	42	413	151	1,176
Were you satisfied with the outcome?	134	183	45	494	320	1,176

According to Marisela Ocampo of the Housing Authority, one HACoLA development was vacated and demolished, with many of the residents being relocated to other Housing Authority sites. This occurred in 2010, when HACoLA relocated all remaining residents from the nearly vacant 300-unit Ujima Village located in south-central LA. Many of the past Ujima residents currently reside in other alternative HACoLA properties.

CONTRIBUTING FACTORS AFFECTING THE JURISDICTION AND REGION

In the City of Los Angeles, the process of granting public housing can be considered a significant contributing factor that affects the service area. The Housing Authority manages over 6,500 units of public housing that are spread across 14 development locations around the city. The application for public housing is available in both Spanish and English and the Authority operates a waiting list for public housing that is based on the data and time of the application as well as family eligibility statues. Applicants' local preferences for public housing will be given to families whose head or co-head of household is:

- 1. Working at least 20 hours per week at the state's minimum wage; or
- 2. Is attending an accredited institution of higher learning (college, trade school, vocational school) full-time, and the course of study is expected to lead to employment; or
- 3. Is working and attending an institution of higher learning, and the combined total is at least 20 hours per week; or
- 4. Otherwise equally income self-sufficient; or
- 5. Families whose family head and co-head, or whose sole member, are disabled or age 62 years of age and older will also receive this preference.¹⁰¹

There are several requirements for eligibility for the program:

- 1. All adult members of the household must pass a criminal background check
- 2. The family must not have any outstanding consumer debt obligations in excess of 60 percent of their monthly income
- 3. At least one member of the household must have legal status. The rent for families with "mixed" (legal/citizen and non-citizen members) will exceed 30 percent of the adjusted monthly income due to the proration requirement as non-eligible members are not able to receive a housing subsidy.¹⁰²

This is significant because labor market engagement is a significant factor in determining which applications are accepted, as well as access to education and disability status. These preferences may work against an individual or family whose head of household is unable to work more than 20 hours, is unable to access higher learning, or who is not disabled.

¹⁰² Ibid.

¹⁰⁰ http://www.hacla.org/apply-public-housing/applyforph.

¹⁰¹ Ibid.

G. DISABILITY AND ACCESS

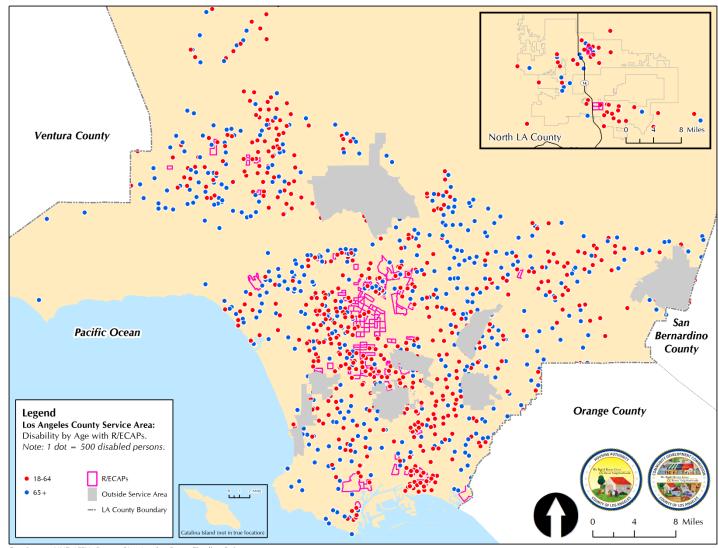
DISABLED POPULATION PROFILE

Service Area

For the Los Angeles County Service Area, the disabled population is dispersed fairly evenly throughout the general population, although a few areas do contain moderate concentrations. For instance, the city of Glendale, El Monte, northwestern Los Angeles, and Rolling Hills/Rolling Hills Estates appear to have higher concentrations of disabled residents aged 65 and older, while central and northern Los Angeles County appear to have moderate concentrations of disabled residents aged 18-64 (see Map IV.203).

The largest concentrations of residents with hearing loss can be found in northern Los Angeles in the North Valley region and in Lancaster. There is a moderately concentrated population of vision-impaired residents clustered around Willowbrook, Compton, and Long Beach. Residents with some kind of cognitive disability can be found in greater density in northern Los Angeles in the North Valley Region and Long Beach (see Map IV.204 on page 369). Disabled residents claiming ambulatory, self-care, or independent living disabilities appear to be fairly evenly distributed across the service area (see Map IV.205 on page 370). None of these disabled populations appear align with R/ECAPs, as can be seen on the maps below.

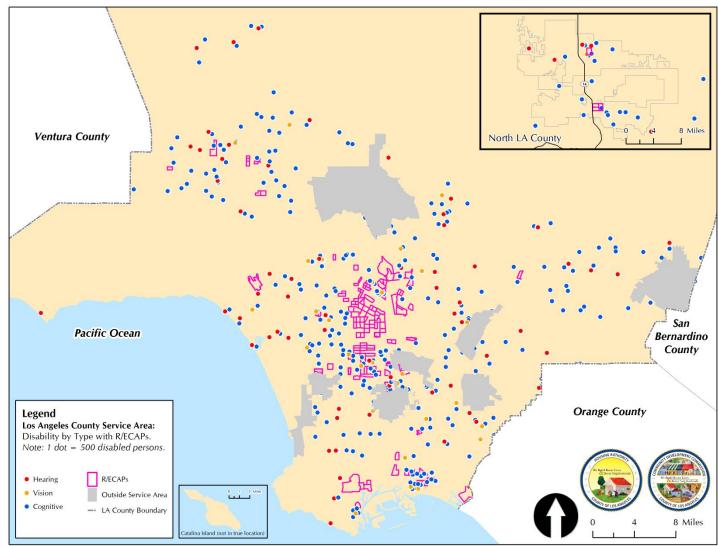
Map IV.203
Disability by Age
Los Angeles County Service Area
Compiled from HUD Database



Map IV.204 Disability by Type (Hearing, Vision, Cognitive)

Los Angeles County Service Area

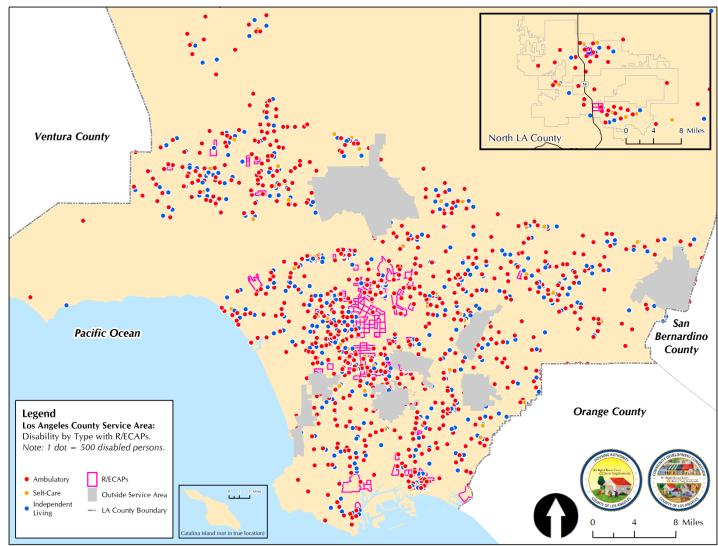
Compiled from HUD Database



Map IV.205 Disability by Type (Ambulatory, Self-Care, Independent Living)

Los Angeles County Service Area

Compiled from HUD Database



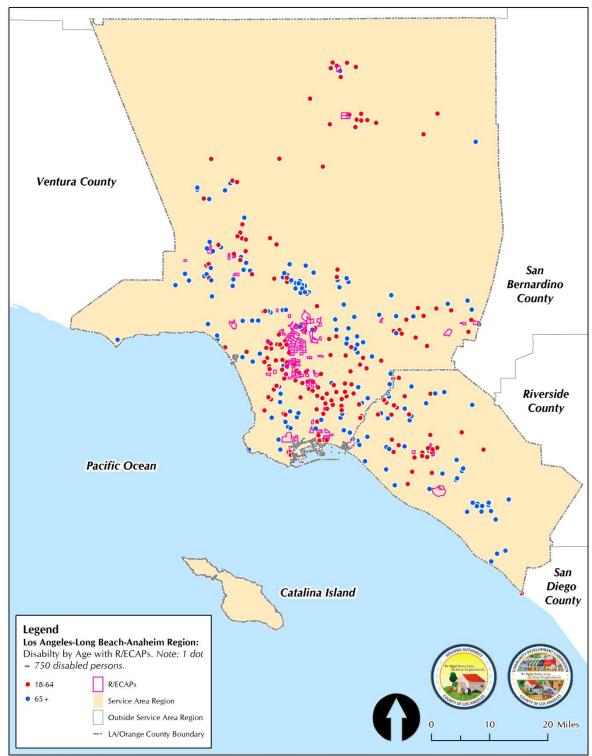
Region

For the Los Angeles-Long Beach-Anaheim Region, there do not appear to be areas of particularly high concentrations of disabled residents in R/ECAPs, although a few areas do stand out as containing moderate concentrations within the region. For instance, the city of Glendale, El Monte, northwestern Los Angeles, and Rolling Hills/Rolling Hills Estates appear to have such a concentration of disabled residents aged 65 and older. Central Los Angeles County, northern Los Angeles County near Palmdale, and Santa Ana appear to have moderate concentrations of disabled residents aged 18-64.

There are large concentrations of residents with hearing loss in central Orange County just south of Irvine and in northern Los Angeles in the North Valley region. There is a moderately concentrated population of vision-impaired residents clustered around Santa Ana and the area around Willowbrook and Compton. Residents with some kind of cognitive disability can be found in higher numbers in Palmdale, northern Los Angeles in the North Valley Region, the area around Westminster and Garden Grove, and in especially high concentrations in Glendale and Long Beach. There are large concentrations of ambulatory-disabled residents near Glendale and Burbank, the area southeast of Downtown Los Angeles, and in north Los Angeles in the North Valley region. As far as residents with self-care disabilities, the only moderate concentration can be found in the area around the cities of Burbank and Glendale. As for residents with independent living disabilities, the largest concentrations appear to be around the cities of Burbank and Glendale and in the City of Los Angeles, to the southeast of Downtown.

The following three maps show disability rates by Census tract in three categories: disability by age, disability by three distinct types (hearing, vision, cognitive), and disability by three different distinct types (ambulatory, self-care, independent living). The various disability data are represented as dot density layers, with R/ECAP Census tracts displayed in pink.

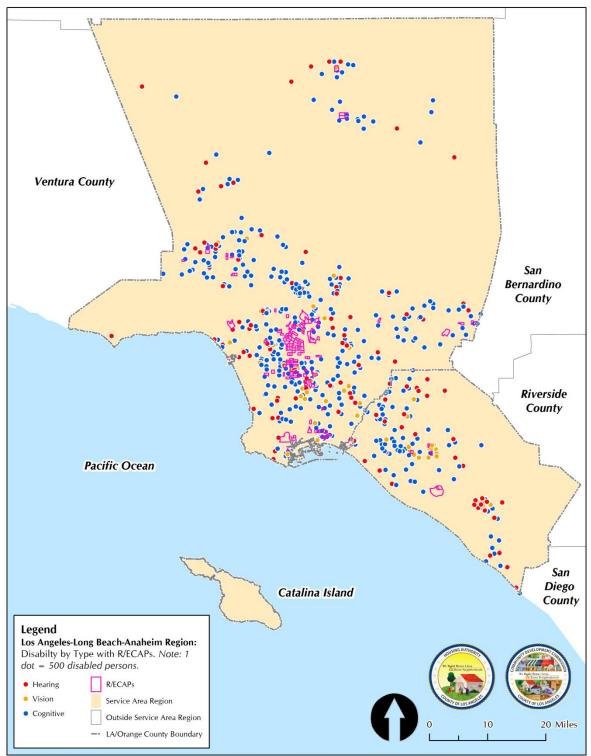
Map IV.206 Regional Disability by Age Los Angeles-Long Beach-Anaheim Region Compiled from HUD Database



Map IV.207 Regional Disability by Type (Hearing, Vision, Cognitive)

Los Angeles-Long Beach-Anaheim Region

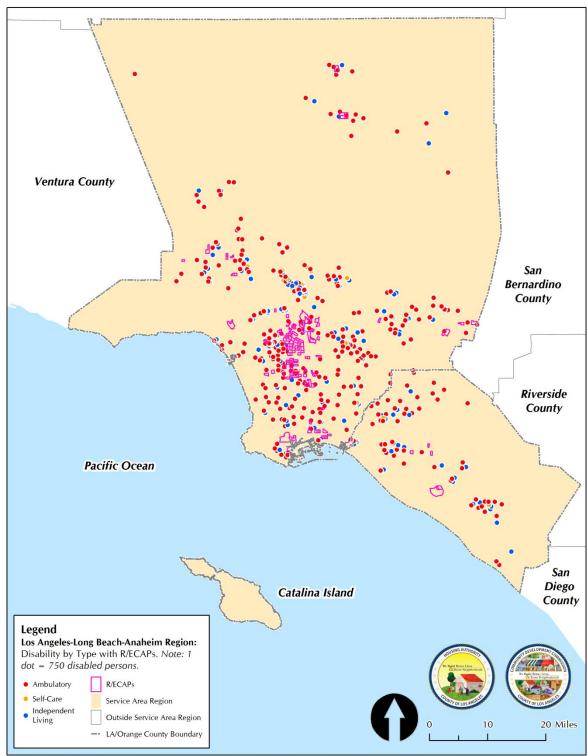
Compiled from HUD Database



Map IV.208 Regional Disability by Type (Ambulatory, Self-Care, Independent Living)

Los Angeles-Long Beach-Anaheim Region

Compiled from HUD Database



VARIATIONS & PATTERNS BY AGE

Service Area

As shown below in Table IV.93, disability rates typically rise steadily among both male and female residents within older cohorts, with nearly 53 percent of residents in the service area having some form of disability. In younger age cohorts, male residents reported having more disabilities, but in the oldest cohort, female residents have a higher disability rate, by nearly nine percentage points. Map IV.203 shown above on page 368, and the following two maps, show the geographic pattern by age and type across the service area.

Table IV.93
Disability by Age
Los Angeles County Service Area
2015 Five-Year ACS Data

	Ma	le	Fem	ale	Tot	al
Age	Disabled Population	Disability Rate	Disabled Population	Disability Rate	Disabled Population	Disability Rate
Under 5	1,641	.6%	1,528	.5%	3,169	.6%
5 to 17	34,088	4.4%	21,078	2.9%	55,166	3.7%
18 to 34	53,029	4.5%	38,313	3.3%	91,342	3.9%
35 to 64	158,565	9.2%	172,531	9.6%	331,096	9.4%
65 to 74	62,093	23.1%	80,524	25.0%	142,617	24.1%
75 or Older	90,026	48.1%	153,851	55.8%	243,877	52.7%
Total	399,442	9.0%	467,825	10.2%	867,267	9.6%

Region

For the Los Angeles-Long Beach-Anaheim Region, as expected, higher disability rates accompany older population cohorts: over half of residents aged 75 and older reported a disability in the Region (see Table IV.94 below). Disability rates remain fairly low for male and female population cohorts aged 34 and younger, as the cumulative rate for those three age groups is just 8.0 percent. Female residents appear to have lower disability rates in younger years but higher disability rates beginning with the 35 – 64 aged cohort. See Map IV.206, above on page 372, for the geographic dispersion of disabled residents by age across the Region.

Table IV.94 Disability by Age Los Angeles-Long Beach-Anaheim Region 2015 Five-Year ACS Data

	Ма	le	Fem	ale	Tot	al
Age	Disabled Population	Disability Rate	Disabled Population	Disability Rate	Disabled Population	Disability Rate
Under 5	2,571	.6%	2,252	.6%	4,823	.6%
5 to 17	49,361	4.4%	30,452	2.8%	79,813	3.6%
18 to 34	74,150	4.4%	53,702	3.3%	127,852	3.8%
35 to 64	219,378	8.7%	237,504	9.1%	456,882	8.9%
65 to 74	87,502	22.1%	114,928	24.3%	202,430	23.3%
75 or Older	131,989	47.6%	222,133	54.6%	354,122	51.8%
Total	564,951	8.8%	660,971	10.0%	1,225,922	9.4%

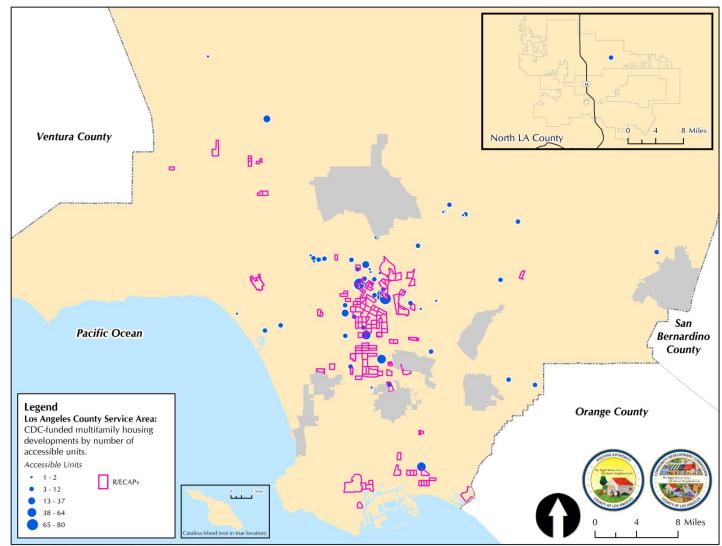
AFFORDABLE ACCESSIBLE HOUSING

Service Area

Map IV.209 below shows the service area with CDC-funded multifamily housing projects by number of accessible housing units (the larger the blue dot, the more accessible units at that location). The vast majority of accessible units are located in Los Angeles, near the downtown area, although there are significant accessible units in San Fernando, Signal Hill, Pasadena, West Hollywood, and in eastern LA County near La Mirada. The following map, on page 378, shows these same units with the disabled population (of all ages) mapped by Census tract. Based on this map, there appears to be an over-supply of accessible units near downtown Los Angeles, where the disabled population is relatively light, while Census tracts with much higher numbers of disabled residents is devoid of accessible units. Finally, in Map IV.211 on page 379, there are a large number of accessible units near R/ECAP Census tracts in Downtown Los Angeles and to the south, in Signal Hill. Thus, it seems that accessible units are located in highly segregated areas but not necessarily in neighborhoods with large numbers of disabled residents. No data was available regarding the unit sizes of these projects and developments.

Map IV.209

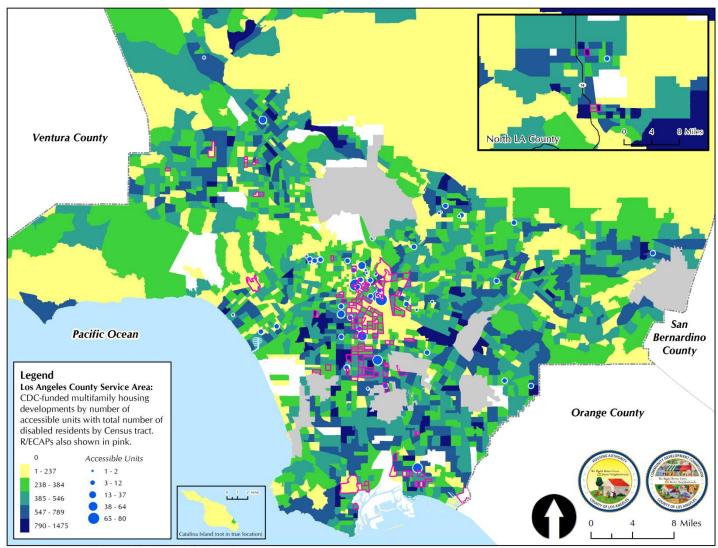
CDC-Funded Multi-Family Accessible Housing Units
Los Angeles County Service Area
Community Development Commission of the County of Los Angeles



Map IV.210 CDC-Funded Multi-Family Accessible Housing Units with Disabled Population

Los Angeles County Service Area

Community Development Commission of the County of Los Angeles



Map IV.211 CDC-Funded Multi-Family Accessible Housing Units with R/ECAPs

Los Angeles County Service Area

Community Development Commission of the County of Los Angeles

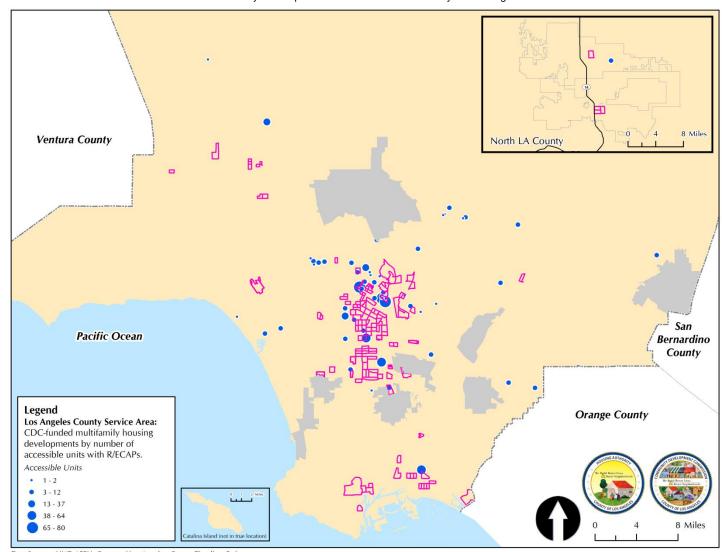


Table IV.95 below shows housing developments in Los Angeles County from the County's Housing Authority, along with unit and accessible unit counts. In total, there are 190 accessible units spread across 68 developments comprised of 3,229 total units in the County. The largest group of developments can be found in South County, where the majority of the 68 developments are in Los Angeles. However, two areas have more overall units: Carmelitos (713 units) and Nueva Maravilla (504).

Carmelitos also included the most accessible units of any site in the County with 33, although these units as a percent of the total are quite low – only 4.6 percent. This percentage is the lowest of all the public housing units listed below in Table IV.95. The highest concentration of accessible units occurs in the North County, where 9.8 percent of all units are accessible (a total of 28 accessible units). Other high concentrations of accessible units occur in West County 2 (8 percent accessible units) and East County (7.2 percent accessible units).

Table IV.95
Public and Affordable Housing in LA County

Housing Authority of the County of LA

Site	No. of Developments	No. of Units	No. of Accessible Units	Percent Accessible
Carmelitos	2	713	33	4.6%
Harbor Hills	1	301	15	5.0%
Nueva Maravilla	1	504	25	5.0%
West County 1	2	263	13	4.9%
West County 2	4	224	18	8.0%
North County	4	285	28	9.8%
East County	11	263	19	7.2%
South County	38	409	20	4.9%
Non-Conventional Developments	5	267	19	7.1%
Total	68	3,229	190	5.9%

In Table IV.96 below, accessible units are shown with total units in CDC-funded housing in LA County. In total, there are 70 accessible units, about 32 percent of the sum total. Based on this data and evidence gathered at the Disability and Access Focus Group, there does not appear to be sufficient affordable, accessible housing around the service area.

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¹⁰³ Data provided by the Housing Authority of the County of Los Angeles.

Table IV.96
CDC Funded Public Housing

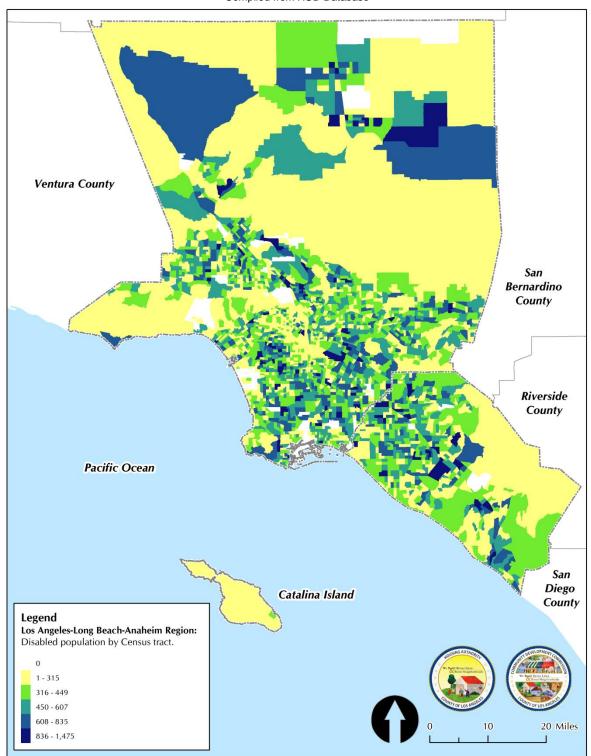
Community Development Commission of Los Angeles County
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City	CDC-Assisted	Total Accessible
	Units	Units
Alhambra	1	0
Baldwin Park	1	0
Bell	2	0
Bell Gardens	2	1
Calabasas	1	0
Claremont	1	0
Compton	7	0
Cudahy	4	0
Downey	2	0
Duarte	1	0
El Monte	4	1
Glendale	3	2
Hacienda Heights	1	0
Highland Park	1	0
Huntington Park	3	0
La Mirada	3	1
La Puente	1	0
La Verne	1	1
Lancaster	1	1
Lennox	1	0
Long Beach	2	0
Los Angeles	119	43
Monrovia	1	1
Monterey Park	3	0
North Hollywood	1	0
Norwalk	4	0
Pasadena	11	6
Pico Rivera	1	0
Pomona	4	1
Quartz Hill	1	0
San Fernando	4	1
Santa Clarita	1	1
Santa Fe Springs	2	0
Santa Monica	2	1
Saugus	1	0
Sierra Madre	1	0
Signal Hill	2	1
South Gate	1	0
South San Gabriel	1	0
West Hollywood	10	6
Whittier	3	1
Willowbrook	1	1
Winnetka	1	Ö
Total	218	70
Total	210	70

Region

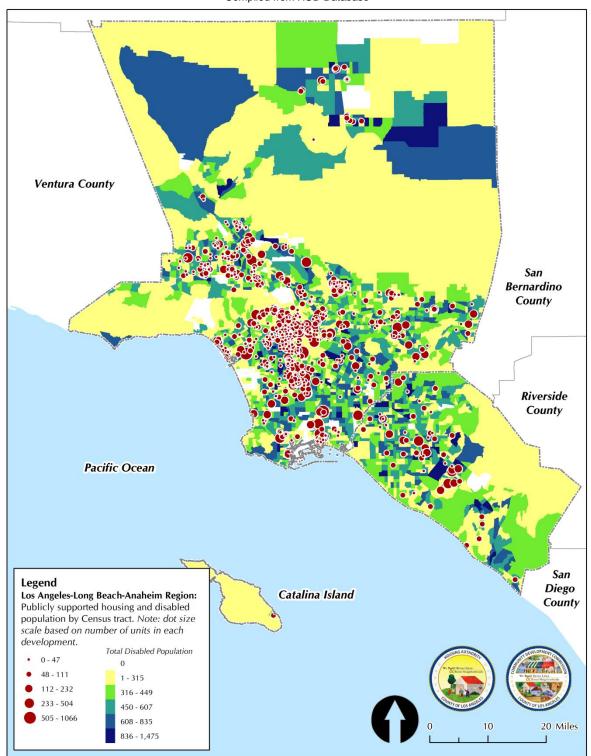
Map IV.212, below, shows the total disabled population in the region of LA and Orange Counties. Census tracts with large numbers of disabled persons can be found in northern LA County and scattered throughout central LA and Orange Counties. Map IV.213, on page 383, shows this same data but with publicly supported housing on top. Based on that map, it appears there is adequate public housing in areas with large disabled populations, except for the large Census tracts in northern LA County. This may be due to the fact that because the tracts are so large, the disabled populations are too dispersed to merit providing publicly supported housing. The large concentration of public housing near Downtown LA does align closely with the high prevalence of R/ECAP Census tracts in that area. No data was available regarding the unit sizes of these projects and developments.

Map IV.212 Disabled Persons by Census Tract
Los Angeles-Long Beach-Anaheim Region
Compiled from HUD Database



Map IV.213 Disabled Persons and Publicly Supported Housing
Los Angeles-Long Beach-Anaheim Region

Compiled from HUD Database



DISABLED ACCESS TO PUBLICLY SUPPORTED HOUSING

There were a total of 32,330 disabled persons living in the four publicly supported housing program categories, as shown below in Table IV.97. This total represents only 3.7 percent of the total disabled service area population of roughly 867,000. For a comparison, this percentage is similar to the number of Asian households living in publicly supported housing (3.9 percent) and Hispanic households (3.3 percent).

Table IV.97

HUD AFFH Table 15 – Disability by Publicly Supported Housing Program Category

Los Angeles County Service Area

Total	32 330	
HCV Program	25.941	
Other Multifamily	717	
Project-Based Section 8	4,265	
Public Housing	1,407	
Compiled from HUD Database		

Map IV.165 on page 319 shows publicly supported housing along with the disabled population in the service area. Based on this map and the table above, disabled residents are able to access and live in publicly supported housing across the service area.

The waiting list for the Housing Authority of the County of Los Angeles operates on a first-come, first-serve basis. Per the Authority's website, the selection criteria for applicants on the list include jurisdiction, family size, vacancies and funding availability. An application is then sent to a resident atop the list and has a specified time limit to fill out the application and return it to the Authority. Upon granting eligibility, the applicant will be referred to a housing site where there is a corresponding vacancy, or the applicant can choose to place his or her name on a senior housing waiting list, if applicable. 105

DISABLED SEGREGATION & INTEGRATION

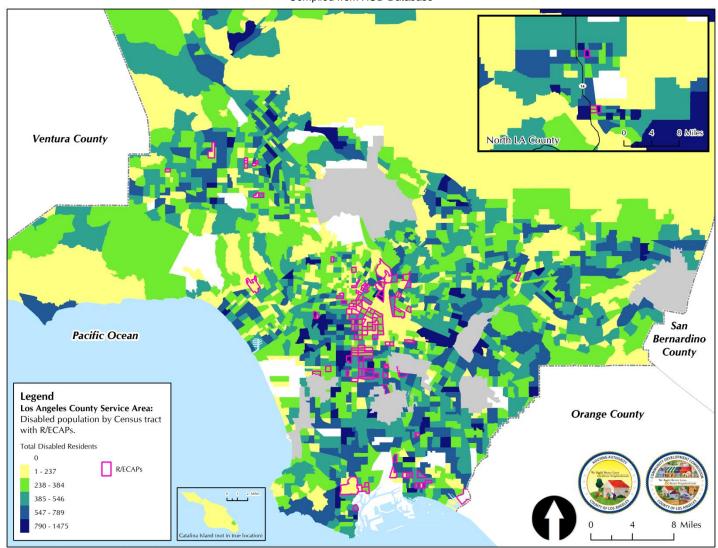
Service Area

Map IV.214, below, shoes disabled residents by Census tract with R/ECAPs. It does not appear that there are R/ECAPs located in Census tracts that also have a high number of disabled residents.

¹⁰⁴ https://www.hacola.org/public-housing/waiting-list-status.

¹⁰⁵ ibid.

Map IV.214
Disabled Residents by Census Tracts with R/ECAPs
Los Angeles County Service Area
Compiled from HUD Database

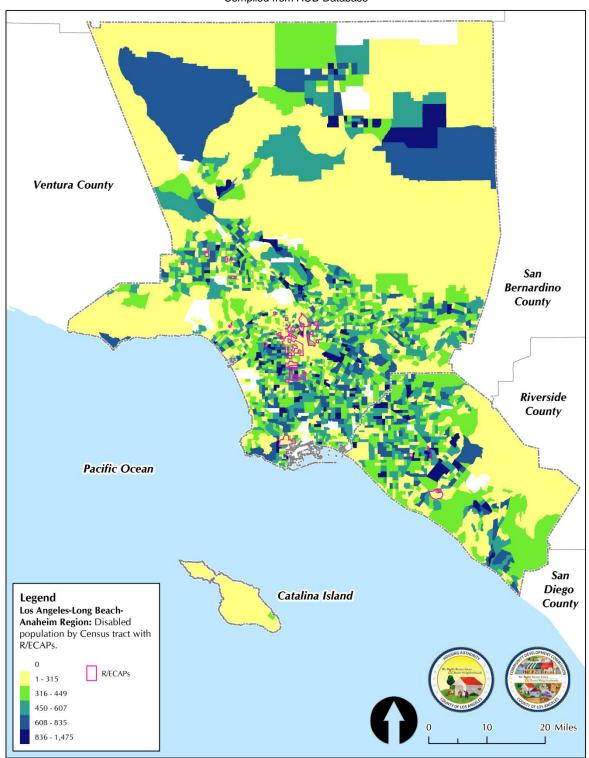


Region

For the Los Angeles-Long Beach-Anaheim Region, disabled persons largely reside in the cities of Los Angeles and Long Beach, both of which have a high dissimilarity index when compared to other entitlements in the region. However, there are also large numbers of disabled residents living in the cities of Burbank and Glendale, which both have relatively low dissimilarity indexes, which may indicate lower levels of segregation than some other cities.

Map IV.215

Disabled Persons and R/ECAPs
Los Angeles-Long Beach-Anaheim Region
Compiled from HUD Database



RANGE OF ACCESSIBILITY OPTIONS FOR DISABLED PERSONS

The United Cerebral Palsy (UCP) of Los Angeles, Ventura, and Santa Barbara exists to advance the independence, productivity, and full citizenship of children and adults with developmental disabilities and those with similar service requirements. ¹⁰⁶ UCP offers eleven independent living apartments in Los Angeles and Orange County, ¹⁰⁷ and the organization aims to address the shortage of accessible housing by way of subsidies made available through HUD. The organization maintains an email address to provide more information.

The Los Angeles County Housing Resource Center operates a search engine that allows users to search and filter by rent range, voucher use, ZIP code, public transit accessibility, proximity to shopping and hospitals, and more. In addition, there are disability-specific criteria which can be specified concerning entry and door options, titchen options, bathroom options, and miscellaneous options.

DISPARITIES IN ACCESS TO OPPORTUNITY

Government Services & Facilities

No known barriers facing disabled persons in accessing government services and facilities.

Public Infrastructure (e.g., sidewalks, pedestrian crossings, pedestrian signals)

The City of Los Angeles has committed to investing \$1.4 billion over the next 30 years to make upgrades and improvements in its sidewalks in an effort to make them more accessible. Property owners willing to pay for repairs can avail themselves of a limited-time rebate program, reimbursing them or a portion of the cost of the repair.

Transportation

The Transportation Services Agency for LA County is an organization committed to improving the mobility on public transit of disabled residents. Reservations can be made over the phone, and the service is available to an ADA paratransit eligible individual to any location within 34 mile of a LA County bus stop and within 34 mile of a Metro rail station during operational hours.

In addition, Metro's website contains videos providing disabled customers with examples of available features when riding a bus or rail. Metro buses can accommodate all types of wheelchairs, including three-wheel scooter-chairs, power chairs and small four-wheel chairs. The general requirement is that the mobility device must fit on the ramp and be able to maneuver to the wheelchair securement area. Additionally, all Metro rail lines are wheelchair accessible, as every station has either a walkway ramp or elevator from the street to the

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¹⁰⁶ https://www.ucpla.org/about-us/.

¹⁰⁷ Specifically, the UCP offers locations in Burbank, Santa Monica, Goleta, Glendale, North Hollywood, Stanton, Torrance, Pasadena, Carpinteria, Los Angeles, and Culver City.

¹⁰⁸ These criteria include: Accessible parking close to unit, flat or no-step entry and/or ramped entry, doorways 32" or wider, accessible elevators, automatic entry door, lever style door handles, and unit on first door.

¹⁰⁹ These criteria include: Low counter(s), front controls on stove/cook-top, minimum 27" knee space under kitchen counter, and non-digital kitchen appliances.

¹¹⁰ These criteria include: Low vanity, 'T' turn or 60″ turning circle in bathrooms, grab bars, lowered toilet, minimum 27″ knee space under vanities, raised toilet reinforced for grab bar, and roll-in shower.

¹¹¹ These criteria include: Accessible flooring, accessible laundry, within paratransit route, and sign language friendly.

¹¹² http://accessla.org/home/.

platform, and in the event of an elevator outage at a given station, disabled customers are offered to take a bus to the next station for free.

Proficient Schools & Educational Programs

No known barriers facing disabled persons in accessing proficient schools and educational programs.

Jobs

The California Employment Development Department administers two federally-funded programs designed to enhance employment opportunities for people with disabilities: the Disability Employment Accelerator and the Disability Employment Initiative. 113 The former focuses on partnerships between the America's Job Center of California locations and the business community to recognize the skills and abilities which meet the needs of California employers and accelerate employment and re-employment strategies for individuals with disabilities. The latter partners with employers to provide services to individuals with disabilities to place them on the path to permanent and secure jobs. 114

REASONABLE ACCOMMODATIONS

The City of Los Angeles offers an Access Request Program which makes repairs requested by/for people with a mobility disability who encounter physical barriers such as broken sidewalks, missing/broken curb ramps or other barriers in the public right of way.¹¹⁵

Metro receives ADA-related service complaints via filing a Metro Civil Rights Complaint Form, calling or faxing the organization, or sending an email or letter. Additionally, disabled persons may make a written accommodation request using Metro's Reasonable Modification Request form. A written reply to such a request is sent within ten business days, which communicates the decision regarding the requested reasonable modification or accommodation and the reason(s) for that decision.

No reasonable accommodation processes applicable for government and service facilities, proficient schools and education programs, and jobs.

HOMEOWNERSHIP DIFFICULTIES BY DISABLED PERSONS

No known barriers facing disabled persons in achieving homeownership.

DISPROPORTIONATE HOUSING NEEDS

Map IV.216, below, shows disabled residents with housing problems by Census tract. The largest clusters of disabled persons in the service area are southwest of Downtown Los Angeles, near Inglewood and Westmont, as well as Long Beach. These areas also correspond to higher percentages of households experiencing 1 or more housing problems. This may suggest higher housing needs with the disabled residents living in those areas.

¹¹³ http://www.edd.ca.gov/jobs and training/Services for People with Disabilities.htm.

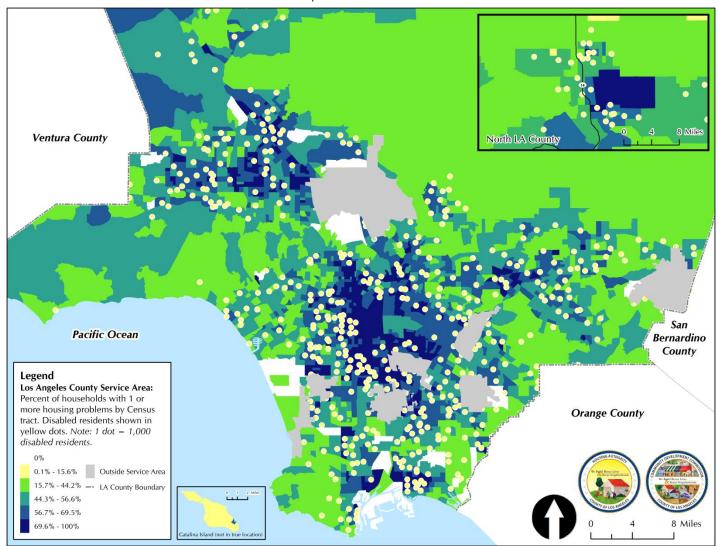
¹¹⁴ ibid.

¹¹⁵ http://www.sidewalks.lacity.org/.

Map IV.216 Housing Problems by Census Tracts with Disabled Residents

Los Angeles County Service Area

Compiled from HUD Database



ADDITIONAL INFORMATION

According a recent *Los Angeles Times* article, the U.S. Department of Justice is joining a 2011 fair housing lawsuit by disabled resident Mei Ling and the housing advocate Fair Housing Council of San Fernando Valley. The suit alleges that the City of Los Angeles "failed to develop enough affordable housing that's accessible to people with disabilities." The City reportedly received at least \$933 million in federal funds over six years for falsely claiming it was following proper requirements for providing accessible housing for disabled residents. In the case of this lawsuit, federal law allows citizens and other private parties to bring suit if and when they believe another entity has falsified claims to receive funding from the government.¹¹⁷

Data from the Housing Authority of the County of Los Angeles show ADA requests received from 2011 – 2016 for public housing sites are shown below. The largest number of requests was in FY 2012 – 2013, with North County and West County accounting for the lion's share of these requests. In the most recent fiscal year, the largest number of ADA requests at any one public housing site occurred at Marina Manor, which consistently had among the most requests since FY 2011.

Table IV.98

Total ADA Requests Received by Sites from FY 2011 – 2016

Total ADA Requests Received by Sites from FY 2011 – 2016											
Public Housing Site	FY 11 – 12	FY 12 – 13	FY 13 – 14	FY 14 – 15	FY 15 – 16						
Carmelitos	35	58	36	35	35						
Harbor Hills	11	16	17	16	16						
Lomita Manor	2	n/a	n/a	n/a	n/a						
Nueva Maravilla	22	17	13	16	26						
East County	16	9	4	16	12						
Arizona	0	0	0	1	0						
Carmelita	0	0	0	0	0						
Francisquito Villa	8	4	0	4	0						
Herbert	2	2	0	2	1						
McBride	0	0	0	0	2						
Simmons	0	1	0	1	0						
Sundance Vista	1	0	2	1	1						
Triggs	0	1	0	0	0						
Whittier Manor	5	1	2	7	8						
Williamson	0	0	0	0	0						
North County	27	69	43	42	28						
Foothill Villa	2	22	6	9	9						
Lancaster Homes	11	24	15	11	N/A						
Orchard Arms	12	20	22	22	18						
Quartz Hill	2	3	0	0	1						
West County	142	75	108	83	90						
Kings Road	27	8	14	19	8						
Marina Manor	90	42	48	34	52						
Ocean Park	5	5	8	2	2						
Palm Apts	9	7	23	15	9						
Santa Monica	6	4	3	2	5						
West Knoll	5	9	12	11	14						
South Scattered Sites	4	8	16	7	15						
Total	259	276	264	248	251						

¹¹⁶ Emily Alpert Reyes & David Zahniser, June 7, 2017. http://www.latimes.com/local/lanow/la-me-ln-justice-disability-suit-20170607-story.html.

¹¹⁷ Ibid.

CONTRIBUTING FACTORS TO DISABILITY & ACCESS ISSUES

Housing Element Law and Compliance

The housing element is one of seven mandated elements of the local general plan. Enacted in 1969, housing element law requires that local governments adequately plan to meet the existing and projected housing needs of all economic segments of the community. State housing element law requires each jurisdiction to evaluate its policies to ensure that they are not constraining the development, improvement or preservation of housing. The housing element is also required to include goals, policies and programs to address fair housing. A housing element found by the California Department of Housing and Community Development (HCD) to be in compliance with state law is presumed to have adequately addressed its policy requirements. Conversely, if not in compliance with state law, jurisdictions are believed to have constraints that may adversely affect affirmatively furthering fair housing.

Table IV.99, on the following page, shows the housing elements compliance status associated with each participating city in the Urban County. The far right column of the table presents the compliance status of each city. Results can show the following classifications of compliance:

- "In" denotes that the local government adopted an element the HCD found in compliance with state housing element law.
- "Out" signifies either the local government adopted an element that did not comply or the local government has not yet submitted a housing element pursuant to the schedule.
- "In Review" means that the element is under review by the HCD as of date of the report.
- "In Local Process" indicates that a draft element has been reviewed but an adopted element has not been submitted.
- "Due" connotes that a housing element has not yet been submitted for the current planning period.

As seen in Table IV.99, three cities were shown to be out of compliance as of June 22, 2017, indicated by italics. These cities are Maywood, South El Monte, and Westlake Village.

Generally, units of local government are out of compliance due to a failure to identify available residential sites, the existence of restrictive development standards and procedures, a lack of a strong housing program commitment, or other non-compliance issues, such as constraints on housing for the disabled or zoning codes that represent barriers to the Americans with Disabilities Act. In the 2011 Al, 17 cities were noted to be out of compliance and from that group, Maywood and Westlake Village remain out of compliance today. It should be noted that in 2011, South El Monte was in compliance but has since been deemed out of compliance.

Of the other grantees in Los Angeles County, only Montebello, Paramount, Pomona, and Rolling Hills were out of compliance as of June 22, 2017 (see Table IV.100 on page 394). In Orange County, only Huntington Beach and San Clemente were out of compliance (see Table IV.101 on page 395).

Table IV.99 Housing Elements Compliance Status Los Angeles Urban County DFEH Data

DFEH Data											
Place	Type	Date Adopted	Reviewed	Compliance							
Agoura Hills	Adopted	9/3/2013	9/19/2013	IN							
Arcadia	Adopted	12/5/2013	12/20/2013	IN							
Avalon	Adopted	2/5/2015	2/6/2015	IN							
Azusa	Adopted	10/25/2013	11/4/2013	IN							
Bell	Draft	5/12/2017	-	IN REVIEW							
Bell Gardens	Adopted	1/21/2014	2/27/2014	IN							
Beverly Hills	Adopted	1/9/2014	2/27/2014	IN							
Calabasas	Adopted	9/26/2013	10/15/2013	IN							
Cerritos	Adopted	1/31/2014	2/6/2014	IN							
Claremont	Draft	5/18/2017	-	IN REVIEW							
Commerce	Adopted	11/13/2013	11/27/2013	IN							
Covina	Draft	10/15/2013	-	DUE							
Cudahy	Adopted	12/15/2014	11/8/2016	IN							
Culver City	Adopted	2/10/2014	2/19/2014	IN							
Diamond Bar	Adopted	1/28/2014	2/27/2014	IN							
Duarte	Adopted	2/19/2014	3/28/2014	IN							
El Segundo	Adopted	2/7/2014	2/24/2014	IN							
Hawaiian Gardens	Adopted	9/30/2013	10/21/2013	IN							
Hermosa Beach	Adopted	9/27/2013	10/18/2013	IN							
Irwindale	Adopted	9/18/2013	9/26/2013	IN							
La Canada Flintridge	Adopted	2/19/2014	3/5/2014	IN							
La Habra Heights	Draft	10/15/2013	-	DUE							
La Mirada	Adopted	2/25/2014	4/30/2014	IN							
La Puente	Adopted	1/29/2016	3/10/2016	IN							
La Verne	Adopted	12/9/2013	1/3/2014	IN							
Lawndale	Adopted	1/15/2014	2/21/2014	IN							
Lomita	Adopted	2/7/2014	2/19/2014	IN							
Malibu	Adopted	1/16/2014	2/12/2014	IN 							
Manhattan Beach	Adopted	2/10/2014	2/24/2014	IN							
Maywood	Adopted	2/24/2014	5/22/2014	OUT							
Monrovia	Adopted	2/13/2014	3/21/2014	IN 							
Rancho Palos Verdes	Adopted	2/10/2014	4/9/2014	IN 							
Rolling Hills Estates	Adopted	4/14/2014	4/29/2014	IN							
San Dimas	Adopted	12/16/2013	12/20/2013	IN							
San Fernando	Adopted	1/24/2014	3/18/2014	IN							
San Gabriel	Adopted	9/23/2013	10/16/2013	IN							
San Marino	Adopted	1/21/2015	2/13/2015	IN IN							
Santa Fe Springs	Adopted	2/18/2014	2/24/2014	IN IN							
Sierra Madre	Adopted	2/14/2014	3/21/2014	IN IN							
Signal Hill	Adopted	2/11/2014	3/18/2014	** *							
South El Monte	Draft Adopted	3/14/2017 5/11/2017		OUT							
South Pasadena	Adopted	1/21/2014	2/27/2014	IN IN							
Temple City Torrance	Adopted	2/3/2014	 								
Walnut	Adopted	2/19/2014	10/15/2013 11/21/2013								
West Hollywood	Adopted		1 71 7								
Westlake Village	Adopted <i>Adopted</i>	12/13/2013 1/14/2014		IN OUT							
vvestiake village	Auopieu	2/24/2014	5/20/2014	001							

Table IV.100 Housing Elements Compliance Status Los Angeles County – Other Grantees DFEH Data

DEEH Data Place Type Date Adopted Reviewed Compliance									
	Type	Date Adopted		Compliance					
Alhambra	Adopted	1/17/2014	2/4/2014	IN					
Artesia	Adopted	2/13/2014	4/3/2014	IN					
Baldwin Park	Adopted	10/11/2013	11/26/2013	IN					
Bellflower	Adopted	10/7/2013	11/26/2013	IN					
Bradbury	Adopted	12/23/2014	3/5/2015	IN					
Burbank	Adopted	1/23/2014	2/4/2014	IN					
Carson	Adopted	10/30/2013	12/10/2013	IN					
Compton	Draft	10/15/2013	-	DUE					
Downey	Adopted	6/28/2013	8/22/2013	IN 					
El Monte	Adopted	1/2/2014	3/17/2014	IN 					
Gardena	Adopted	12/2/2013	12/10/2013	IN 					
Glendale	Adopted	2/5/2014	2/24/2014	IN					
Glendora	Adopted	11/20/2013	11/26/2013	IN					
Hawthorne	Adopted	2/19/2014	3/21/2014	IN					
Hidden Hills	Adopted	1/31/2014	4/9/2014	IN					
Huntington Park	Draft	10/15/2013	-	DUE					
Industry	Adopted	2/12/2014	3/21/2014	IN					
Inglewood	Adopted	4/1/2014	5/20/2014	IN					
Lakewood	Adopted	8/16/2013	10/9/2013	IN					
Lancaster	Adopted	10/28/2013	12/31/2013	IN					
Long Beach	Adopted	1/15/2014	4/2/2014	IN					
Los Angeles	Adopted	1/10/2014	4/2/2014	IN					
Los Angeles County	Adopted	2/5/2014	4/30/2014	IN					
Lynwood	Adopted	9/13/2013	10/11/2013	IN					
Montebello	Adopted	4/1/2015	6/26/2015	OUT					
Monterey Park	Adopted	12/23/2013	2/4/2014	IN					
Norwalk	Adopted	6/26/2014	8/13/2014	IN					
Palmdale	Adopted	1/3/2014	2/27/2014	IN					
Palos Verdes	Adopted	7/23/2014	7/28/2014	IN					
Paramount	Adopted	2/13/2014	3/10/2014	OUT					
Pasadena	Adopted	2/13/2014	2/24/2014	IN					
Pico Rivera	Adopted	10/23/2013	11/12/2013	IN					
Pomona	Adopted	2/21/2014	5/19/2014	OUT					
Redondo Beach	Draft	5/23/2017	-	IN REVIEW					
Rolling Hills	Adopted	3/3/2014	5/30/2014	OUT					
Rosemead	Adopted	12/2/2013	12/16/2013	IN IN					
Santa Clarita	Adopted	10/25/2013	25/2013 11/5/2013						
Santa Monica	Adopted	1/6/2014	1/29/2014	IN					
South Gate	Adopted	1/30/2015	3/20/2015	IN IN					
Vernon	Adopted	10/15/2013							
West Covina	Adopted	3/9/2017 4/5/2017		IN					
Whittier	Adopted	12/20/2013	2/6/2014	IN					

Table IV.101Housing Elements Compliance Status

Orange County
DEFH Data

Place	Type	DEEH Data Date Adopted	Reviewed	Compliance	
Aliso Viejo	Adopted	5/22/2014	10/1/2014	IN	
Anaheim	Adopted	2/21/2014	3/17/2014	IN	
Brea	Adopted	11/22/2013	11/26/2013	IN	
Buena Park	Adopted	12/4/2013	12/6/2013	IN	
Costa Mesa	Adopted	1/29/2014	2/5/2014	IN	
Cypress	Adopted	10/24/2013	11/4/2013	IN	
Dana Point	Adopted	12/23/2013	1/8/2014	IN	
Fountain Valley	Adopted	2/11/2014	3/12/2014	IN	
Fullerton	Adopted	9/29/2015	11/20/2015	IN	
Garden Grove	Adopted	6/6/2013	6/14/2013	IN	
Huntington Beach	Draft	12/24/2015	1/29/2016	OUT	
Irvine	Adopted	9/17/2013	11/4/2013	IN	
La Habra	Adopted	1/30/2014	2/5/2014	IN	
La Palma	Adopted	2/3/2014	2/12/2014	IN	
Laguna Beach	Adopted	2/11/2014	3/17/2014	IN	
Laguna Hills	Adopted	10/15/2013	11/5/2013	IN	
Laguna Niguel	Adopted	9/10/2013	11/5/2013	IN	
Laguna Woods	Adopted	2/10/2014	2/27/2014	IN	
Lake Forest	Adopted	1/15/2014	1/21/2014	IN	
Los Alamitos	Adopted	2/10/2014	2/25/2014	IN	
Mission Viejo	Adopted	3/6/2013	3/7/2013	IN	
Newport Beach	Adopted	10/18/2013	10/31/2013	IN	
Orange	Adopted	2/12/2014	3/19/2014	IN	
Orange County	Adopted	1/9/2014	1/29/2014	IN	
Placenta	Adopted	1/16/2014	2/4/2014	IN	
Rancho St. Margarita	Adopted	10/10/2013	10/17/2013	IN	
San Clemente	Draft	1/10/2017	3/10/2017	OUT	
San Juan Capistrano	Draft	5/26/2017	-	IN REVIEW	
Santa Ana	Adopted	2/14/2014	4/23/2014	IN 	
Seal Beach	Adopted	10/18/2013	11/6/2013	IN 	
Stanton	Adopted	10/15/2013	11/5/2013	IN 	
Tustin	Adopted	10/15/2013	11/6/2013	IN	
Villa Park	Adopted	1/4/2017	4/4/2017	IN IN	
Westminster	Adopted	2/6/2014 4/9/2014		IN IN	
Yorba Linda	Adopted	10/28/2013	11/4/2013	IN	

Planning and Zoning Survey Results

As part of the preparation of this AFH, the 2017 Los Angeles County Planning and Zoning Survey was administered electronically and provided by the Los Angeles Community Development Commission. The survey, which ran from January through March, sought to collect answers to 35 questions regarding local governmental codes or policies and practices that may result in the creation or perpetuation of one or more impediments to fair housing choice. A total of 49 responses were collected, and nearly all the questions were posed to elicit a "yes" or "no" response; respondents who said "yes" were asked to elaborate with a narrative response.¹¹⁸

The survey had a particular focus on land use and zoning practices and procedures that can act as barriers to the situating, development or use of housing for individuals with disabilities.

¹¹⁸ Although 49 responses were collected, one was from South Gate so it has been excluded from this analysis as South Gate is not in the Los Angeles County service area. Also, two responses were collected from South El Monte, so the duplicate was excluded. Thus, only 47 of the 49 responses have been analyzed in this report.

However, it also touched on areas that may affect fair housing choice for families with children or otherwise serve as impediments to fair housing choice.

The survey was intended to help with the analysis of the codes and other issues related to land use and zoning decision-making provided by each of the 47 participating cities, plus Los Angeles County for the unincorporated areas of the county. In identifying impediments to fair housing choice, the survey looked to distinguish between regulatory impediments, based on specific code provisions, and practice impediments, which arise from practices or implementing policies used by the jurisdiction.

The following narrative is intended to summarize the key findings of the survey for each of the questions. At present, representatives from all participating cities in the Urban County have responded to the survey except for the following: Avalon, Beverly Hills, Cerritos, Culver City, Hawaiian Gardens, La Habra Heights, La Verne, Maywood, San Dimas, and San Gabriel. Additionally, representatives from the following cities responded: Baldwin Park, Carson, Gardena, Hawthorne, Inglewood, Lakewood, Los Angeles, Los Angeles County, Pasadena, Santa Monica, and South Gate.

Table IV.102, below, outlines the survey questions posed to the respondents, and following this table, a narrative expands on the answered provided in the survey.

Table IV.102

Planning & Zoning Survey Questions

	Planning & Zoning Survey Questions
4	Does the code definition of "family" have the effect of discriminating against unrelated individuals with disabilities who reside together in a congregate or group living arrangement?
5	Does the code definition of "dwelling unit" or "residential unit" have the effect of discriminating against unrelated individuals with disabilities who reside together in a congregate or group living arrangement?
6	Does the code or any policy document define "disability," if at all, at least as broadly as the Federal Fair Housing Act?
7	Are personal characteristics of residents, including, but not necessarily limited to, disability, considered?
8	Does the code limit housing opportunities for disabled individuals through restrictions on the provision of onsite
9	supportive services? Does the jurisdiction policy have more restrictive limits for occupancies involving disabled residents than for other
Ů	occupancies of unrelated, non-disabled persons?
10	Does the jurisdiction have, either by ordinance or policy, a process by which persons with disabilities can request reasonable accommodations (modifications or exceptions) to the jurisdiction's codes, rules, policies, practices, or services, necessary to afford persons with disabilities an equal opportunity to use or enjoy a dwelling?
11	If the jurisdiction supplies or manages housing, is there a clear policy to allow disabled persons residing in or seeking to reside in the housing to make or request reasonable physical modifications or to request reasonable accommodations?
12	If you answered 'Yes' to the previous question, is the policy communicated to applicants or residents?
13	Does the jurisdiction require a public hearing for disabled persons seeking specific exceptions to zoning and land-use rules (variances) necessary for them to be able fully use and enjoy housing?
14	Does the zoning code distinguish housing for persons with disabilities from other residential uses by requiring an application for a conditional use permit (CUP)?
16	Does the code contain any development standards or special provisions for making housing accessible to persons with disabilities?
17	Does the Code specifically reference the accessibility requirements contained in the Fair Housing Amendments Act of 1988?
18	Does the jurisdiction conduct plan checking for accessibility compliance of covered multi-family new construction?
20	Is there a zoning ordinance or other development policy that encourages or requires the inclusion of housing units affordable to low and/or moderate income households (so-called 'inclusionary housing')?
21	Does the zoning ordinance allow for mixed uses?
	Does the zoning ordinance provide for any of the following: 1) development incentives for the provision of affordable
22	housing beyond those provided by state law; 2) development by right of affordable housing; or, 3) a zoning overlay to allow for affordable housing development?
23	Does the zoning ordinance describe any areas in this jurisdiction as exclusive?
24	Are there exclusions or discussions in the ordinance or any planning policy document of limiting housing on the basis of any of the following characteristics covered by fair housing laws?
26	Are there any standards for Senior Housing in the zoning ordinance?
27	Do the standards comply with State or Federal law on housing for older persons (i.e., solely occupied by persons 62 years of age or older, or occupied by at least one (1) person 55 years of age, or other qualified permanent resident pursuant to Civil Code 51.3)?
28	Is the location of Senior Housing treated differently than that other rental or for-sale housing?
29	Does the zoning code distinguish senior citizen housing from other residential uses by the application of a conditional use permit (CUP)?
30	Does the zoning code or other planning policy document address housing for "special needs" populations?
31	Does the zoning ordinance establish occupancy standards or maximum occupancy limits that are more restrictive than state law, which incorporates the Uniform Housing Code (UHC)?
32	Does the jurisdiction encourage or require affordable housing developments to give an admission preference to
22	individuals already residing within the jurisdiction?
33	If you answered Yes to the above questions, is it a requirement?
34	Does the jurisdiction analyze possible impacts on fair housing choice resulting from its redevelopment activities?
35	Does the zoning ordinance or other planning or policy document include a discussion of fair housing?

Table IV.103 **Planning & Zoning Survey Results (Part A)**Answers by Participating Jurisdiction, 1 = Yes, 0 = No

A	Answers by Participating Jurisdiction, 1 = Yes, 0 = No Question Number													
City	_	-	•	-	_					40	44	40	47	40
Ī	4	5	6	7	8	9	10	11	12	13	14	16	17	18
Agoura Hills	0	0	0 1	0	0	0	1	0	0	0	0	0 1	0	1
Arcadia Azusa	0	0	0	0	0	1	1	0	0	0	1	1	1	1
	0	0	1	0	0	0	1	0	0	0	0	0	0	0
Baldwin Park Bell	0	0	0	0	0	0	1	1	0	1	1	0	0	1
_		0		0	0	0		0	0	-	0	0	-	
Bell Gardens	0	_	0	_	_	-	1	_	_	1	_	1	0	11
Calabasas	0	0	0 1	0	0	0	1	0	0	0	0		1	11
Clarence	0	0		1	0	0	1		1	_	0	1	1	1
Claremont	0	0	0 1	0	0	0	1	0	0	0	0	0	0	0 1
Commerce	0	0		0	0	0		0	0 1	1	0	1	0	
Covina			0	0		0	1				0	0	0	1
Cudahy	0	0	0	0	0	0	0	0	0	1	0	1	0	
Diamond Bar	0	0	1	0	0	0	1	0	1	0	0	1	1	1
Duarte		_		_	_	-		_	_		_		1	•
El Segundo	0	0	1	0	0	0	1	0	0	0	0	1	1	11
Gardena	0	0	0 1	0	0	0		0	0	1	0	1	1	11
Hawthorne	0	0		1	0	0	1			0	0		-	1
Hermosa Beach	0	0	1	1	0	0	1	0	0	1	0	0	0	11
Inglewood	0	0	1	0	0	0	1	0	0	0	0	0	0	1
Irwindale	0	0	0	0	0	0	1	0	0	0	0	0	0	0
La Canada Flintridge	0	0	0	1	0	0	1	0	0	1	0	0	0	0
La Mirada	0	0	0	0	0	0	1	0	0	0	0	0	0	1
La Puente	1	0	0	0	0	0	0	0	0	0	0	0	0	0
Lakewood	1	0	1	1	1	0	1	1	0	1	0	0	1	1
Lawndale	0	0	1	0	0	0	1	0	0	1	0	1	0	1
Lomita	0	0	0	0	0	0	1	1	1	0	0	0	0	0
Los Angeles	0	0	1	0	0	0	1	1	1	0	0	0	0	1
Los Angeles County	0	0	1	0	0	0	1	0	0	0	1	1	1	1
Malibu	0	0	0	0	0	0	1	0	0	1	0	0	0	1
Manhattan Beach	0	0	1	1	0	0	1	0	0	0	0	1	0	1
Monrovia	0	0	0	0	0	0	1	0	0	0	0	0	0	1
Pasadena	0	0	1	0	0	0	1	0	0	1	1	1	0	1
Rancho Palos Verdes	0	0	1	1	0	0	1	0	0	0	0	0	0	1
Rolling Hills Estates	0	0	1	0	0	0	1	0	0	0	0	1	1	1
San Fernando	0	0	0	0	0	0	1	0	0	0	0	1	1	1
San Marino	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Santa Fe Springs	0	0	1	0	0	0	1	0	0	0	0	1	1	1
Santa Monica	0	0	1	0	0	0	1	0	0	0	1	0	0	1
Sierra Madre	0	0	1	1	0	0	1	0	0	1	1	0	0	0
Signal Hill	0	0	0	0	0	0	1	1	1	0	0	1	0	1
South El Monte	0	0	0	0	0	0	0	0	0	0	0	1	1	1
South Pasadena	1	1	1	0	1	1	1	1	0	1	0	1	0	0
Temple City	0	0	0	0	0	0	1	0	0	0	1	1	1	1
Torrance	0	0	0	0	0	0	1	0	0	1	0	1	1	1
Walnut	0	0	0	0	0	0	1	0	0	1	0	1	0	1
West Hollywood	0	0	0	0	0	0	1	0	0	1	0	1	1	1
Westlake Village	0	0	0	0	0	0	1	0	0	0	0	1	0	0

Table IV.104 **Planning & Zoning Survey Results (Part B)**Answers by Participating Jurisdiction, 1 = Yes, 0 = No

	Answers by Participating Jurisdiction, 1 = Yes, 0 = No Question Number														
City															
-	20	21	22	23	24	26	27	28	29	30	31	32	33	34	35
Agoura Hills	1	1	1	0	0	0	0	0	1	1	0	0	1	0	0
Arcadia	1	1	1	0	0	1	0	0	0	1	0	0	0	0	1
Azusa	0	1	1	0	0	1	0	0	1	1	0	1	0	1	1
Baldwin Park	0	1	0	0	0	0	0	0	0	1	0	1	0	0	1
Bell	0	1	0	0	0	0	0	0	1	0	0	0	1	0	0
Bell Gardens	0	1	0	0	0	0	0	0	0	1	0	0	0	0	1
Calabasas	1	1	1	0	0	0	1	0	0	1	0	0	0	0	1
Carson	1	1	1	0	0	0	0	0	0	1	0	0	0	0	1
Claremont	1	1	1	0	0	1	1	0	0	1	0	0	0	0	1
Commerce	1	1	1	0	0	1	1	0	0	1	0	0	0	1	1
Covina	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Cudahy	0	1	1	0	0	1	1	0	0	1	0	0	0	0	0
Diamond Bar	1	1	1	0	0	0	0	0	0	1	0	0	0	0	1
Duarte	1	0	0	0	0	1	1	0	0	1	0	0	0	0	1
El Segundo	1	1	1	0	0	0	0	0	1	1	0	0	1	0	1
Gardena	1	1	1	0	0	1	1	0	0	1	0	0	0	0	0
Hawthorne	1	1	1	0	0	1	0	0	0	1	0	0	0	0	1
Hermosa Beach	1	1	0	0	0	1	0	0	0	1	1	0	0	1	1
Inglewood	0	1	1	0	0	0	0	0	0	1	0	0	0	0	0
Irwindale	0	0	0	0	0	1	1	0	1	1	0	1	0	1	1
La Canada Flintridge	0	1	0	0	0	1	0	1	1	0	0	0	1	0	1
La Mirada	0	1	0	0	0	1	0	0	0	1	0	0	0	0	0
La Puente	1	1	0	0	1	1	1	1	1	0	0	0	0	0	1
Lakewood	0	0	1	0	0	1	0	0	1	0	0	0	0	0	0
Lawndale	1	1	1	0	0	1	1	0	0	1	0	1	0	1	1
Lomita	0	1	0	0	0	1	1	0	1	1	0	0	0	0	1
Los Angeles	1	1	1	0	0	1	1	0	0	1	0	0	0	0	1
Los Angeles County	1	1	1	0	0	1	1	0	0	1	0	0	0	0	1
Malibu	1	0	1	0	0	0	0	0	0	1	0	0	0	0	1
Manhattan Beach	1	1	1	0	0	1	1	0	1	1	0	0	1	0	1
Monrovia	0	1	0	0	0	1	0	0	0	1	0	0	0	0	1
Pasadena	1	1	1	0	0	1	1	0	1	1	0	1	1	0	1
Rancho Palos Verdes	1	0	0	0	0	0	1	1	0	1	0	0	0	0	1
Rolling Hills Estates	1	1	0	0	0	0	0	0	0	1	0	0	0	0	1
San Fernando	0	1	1	0	0	1	1	0	0	1	0	1	0	0	1
San Marino	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Santa Fe Springs	1	1	1	0	0	0	0	0	0	1	0	1	1	0	1
Santa Monica	1	1	1	0	0	1	1	0	1	1	0	1	1	0	1
Sierra Madre	1	1	0	1	0	1	1	1	1	1	0	1	1	0	1
Signal Hill	1	1	0	1	0	1	0	1	1	1	0	0	0	0	0
South El Monte	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0
South Pasadena	0	0	1	1	0	1	1	1	0	1	1	1	1	1	1
Temple City	1	1	0	0	0	1	1	1	1	1	1	0	0	0	1
Torrance	1	1	1	0	0	1	1	0	1	1	0	0	0	0	1
Walnut	0	1	0	0	0	0	0	0	0	0	0	0	0	0	1
West Hollywood	1	1	0	0	0	1	1	0	1	1	0	0	0	0	1
Westlake Village	1	1	1	0	0	0	0	0	0	1	0	0	0	0	1

Service Area Planning and Zoning Survey Results

Questions 1 through 3 simply pertained to identification information of the respondent (name of jurisdiction, department of respondent, and name of respondent) so they are not included in this analysis.

Question 4 inquired about definitions of *family* within the service area and if that definition might be construed as discriminatory toward persons with disabilities living in group homes or something similar. One might think that all responses would be *no*, but this was not the case. 3 out of 49 responses (La Puente, Lakewood, and South Pasadena) answered *yes*. One respondent felt that the definition of *family* was inherently the cause of division between an otherwise functioning housing unit. Another respondent mentioned the use of ADA definitions of terms like *family* in determining status, and that his or her jurisdiction in question tends to err on the side of greater leniency in cases of housing for disabled residents.

Question 5 asked about the definition of a *dwelling unit* and whether it may be discriminatory towards persons with disabilities. One respondent felt that, as the term *family* did not preclude unrelated individuals per the city's definition, it was not discriminatory against unrelated disabled residents. The City of Arcadia's definition was also not perceived as discriminatory, as the City does not regulate or restrict the composition of a household and defines *dwelling unit* broadly so as to not mischaracterize congregate or group living arrangements. In all, only the respondent from South Pasadena respondent felt that their city's code definition of *dwelling unit* had a discriminating effect against unrelated disabled persons.

Question 6 asked if the local code defined *disability* at least as broadly as the Federal Fair Housing Act; 26 respondents (53 percent) answered no, while the remaining 23 respondents answered yes. The Lomita Municipal Code has no definition of the term *disability*, nor does the Los Angeles Municipal Code. The latter code does, according to the respondent, refer to definitions of *disability* for specific purposes of applying reduced parking requirements for senior independent housing, assisted living care housing, or housing developments occupied by persons with a disability. For other purposes related to housing, the City applies the definition of *disability* as contained in applicable State and Federal law. Inglewood's Municipal and Zoning Code defines *disability* as identical to the definition within the Federal Fair Housing Act and the California Fair Employment and Housing Act.

In Question 7, respondents were asked if the code in their respective cities considered personal characteristics of residents, such as disability. Most respondents (nearly 82 percent) answered no to this question, while the remaining 9 respondents indicated their local did consider these kinds of characteristics: Carson, Hawthorne, Hermosa Beach, La Canada Flintridge, Lakewood, Manhattan Beach, Rancho Palos Verdes, and Sierra Madre. In Lomita, disability or other personal characteristics are not considered reasonable restrictions for dwelling occupants, and another respondent indicated that while personal characteristics are not considered, the intensity of use is considered. Several other respondents said that personal characteristics are either not discriminated against or even mentioned at all in the municipal code.

Question 8 asked respondents if their respective code limited housing opportunities for disabled residents through restrictions on the provision of onsite supportive services, and

nearly 96 percent of the respondents answered *no*. Only two respondents answered in the affirmative (representatives from Lakewood and South Pasadena). For Los Angeles County, onsite supportive services are allowed as a per-se residential use when limited to the residents of the housing development. Another respondent mentioned that while on-site supportive services to disabled residents were not explicitly restricted, the intensity and scale of the operation would need to be considered.

In the 9th question, respondents were asked if their respective jurisdiction has more restrictive limits for occupancies involving disabled residents than for other occupancies of unrelated, non-disabled persons, and nearly 96 percent answered *no*. Only two respondents answered in the affirmative (Azusa and South Pasadena). Many respondents, like that of Malibu, simply reiterated the fact that the City does not define the personal characteristics of group home residents.

Question 10 was regarding the reasonable accommodations request in a particular jurisdiction, and if there was a process in place whereby a disabled person may request an exception or modification to a code, rule, or policy to afford such a person an equal opportunity to use or enjoy a dwelling. 90 percent of respondents answered yes, while the remaining 10 percent said no. Those answering in the negative were representatives from Cudahy, La Puente, San Marino, and South El Monte. Many respondents mentioned a formal procedure by which a disabled person may request reasonable accommodation, and the Diamond Bar Municipal Code has separate considerations between major and minor accommodation procedures. One respondent noted that in 2016, their respective City adopted an ordinance prepared by the City Attorney's office regarding a reasonable accommodation procedure, using the state department community development's "model ordinance" as the template.

Question 11 inquired about a clear policy in the jurisdiction allowing disabled persons residing in or seeking to reside in the housing to request reasonable physical modifications or accommodations. This question, however, only applied to jurisdictions that supplied or managed housing, and the vast majority of respondents (77.1 percent) answered n/a. 9 respondents answered yes, while the remaining two answered yes. No comment data was available for this question.

Question 12 follows very closely with 11, as it asks the respondent, if they answered *yes* to the previous question, if the policy is communicated to applicants or residents. As there were so many respondents who answered *n*/a for the previous question, there were only 11 answers to this question, and 7 of them answered *yes* while the last 4 answered *no*. Many respondents felt their jurisdictions make every attempt to follow through on their policies allowing a reasonable accommodations process when requested by disabled residents.

In in the 13th question, respondents were asked if their jurisdiction required a hearing from disabled persons seeking specific exceptions to variances which would be necessary for them to fully use and enjoy housing, and 30 answered *no*. Eighteen of the respondents answered that their jurisdictions did in fact require such a public hearing. In Los Angeles, a reasonable accommodation request is made by submitting a form to the Department of City Planning, not a public hearing. On the other hand, another respondent said that a public hearing of the City

Council to get zoning ordinances changed, but the hearing was not just for the disabled community. Another respondent remarketed that these requests can be reviewed and decided administratively, unless the applicant is seeking a permit or approval normally reviewed by the Planning Commission, in which case a public hearing would be required.

Question 14 inquired about the jurisdiction's zoning code distinguishing between housing for persons with disabilities from other residential uses by requiring an application for a conditional use permit (CUP). 41 respondents said that their code made no distinction, while 7 answered in the affirmative (Azusa, Bell, County of Los Angeles, Pasadena, Santa Monica, Sierra Madre, and Temple City). One applicant mentioned that the development code is applied fairly to all applicants, and persons with disabilities would be required to follow the same procedural steps for approval as any non-disabled person. This was the common sentiment among most of the respondents, although one person mentioned that a CUP was required for a licensed group living facility (defined as seven or more residents).

Question 15 sought to elicit development standards that provided for disability-accessible parking in multi-family projects. Many respondents indicated the ADA requirements were a minimum, with additional standards placed on top. One respondent described standards for handicapped parking stalls, while another referenced the 2016 California Building Code standards as the basis for their jurisdiction's standards. And still another response said that, at present, there were no city-wide standards for accessible parking but that the City is updating the zoning code to be consistent with the recently certified Housing Element, of which one objective is to consider reduced parking requirements for housing developments that set aside a portion of the units for disabled persons.

Question 16 asked respondents if their respective municipal code contained development standards specific to making housing accessible for disabled persons, to which 57.5 percent answered *yes*. The other 43.5 percent, or 20 out of 47, answered *no*. No comment data was available for this question.

In Question 17, respondents were asked if the municipal code contains specific references to accessibility standards and requirements as outlined in the Fair Housing Amendments Act of 1988, to which 57.8 percent of respondents said *no*. The other 19 (or 42.2 percent) answered in the affirmative. Several responses included reference to the 2016 California Building Code and that particular jurisdiction's application of said code to its zoning code, with no reference therein to the FHAA requirements. One respondent indicated that their respective jurisdiction did indeed reference the FHAA, and in fact, made the tern *fair housing laws* explicitly synonymous with the FHAA. In Carson, the municipal code meets all state and Federal law requirements pertaining to accessibility for disabled persons.

Question 18 asked if the jurisdiction conducted plan check for accessibility compliance of multifamily new construction, and over 80 percent answered *yes*. Only 9 of the 47 responses answered *no*. No comment data was available for this question.

Question 19 asks the respondents to check all Section 504 requirements that may apply to federally-assisted new housing construction, only if the respondent marked yes on Question

15. Most respondents simply answered n/a, although there was a fairly even split among the remaining respondents between the three Section 504 requirements listed: A minimum of 5 percent of total dwelling units (but not less than one unit) accessible for individuals with mobility impairments (10 selections), an additional 2 percent of dwelling units (but not less than one) accessible for persons with hearing or vision impairments (8 selections), and all units made adaptable that are on the ground level or can be reached by an elevator (11 selections). Most respondents indicated that plan check was conducted according to all required codes and standards.

Beginning with Question 20, the rest of the survey focused less on accessibility for disabled residents and more on affordable housing. This question asked respondents if there is a zoning ordinance or policy that encourages inclusionary housing, that is, affordable housing. 31 out of 47 responses said *yes*, while the other 16 said *no*. One respondent mentioned a density bonus adopted by the jurisdiction in 2013, while another said the jurisdiction's zoning code contained a requirement for inclusionary zoning for developments greater than 4 residential units such that the proposed development must dedicate up to 5 percent of all units as affordable to very low income households or dedicate up to 10 percent of all units as affordable to low income households. On the other hand, the City of Rolling Hills Estates has not adopted an inclusionary housing ordinance.

Question 21 deals with mixed uses, and whether the jurisdiction allows for this, to which 40 of 48 respondents answered yes, while the remaining 8 answered in the negative. While there is no mixed use housing in Lakewood, according to one respondent, Agoura Hills allows mixed use in the Agoura Village Specific Plan area, and accessibility requirements are applied. Other jurisdictions were mentioned as having specific areas in which mixed use was allowed, such as Rolling Hills Estates and El Segundo.

Question 22 inquired about the zoning ordinance providing for either: development incentives for the provision of affordable housing beyond those provided by state law; development by right of affordable housing; or, a zoning overlay to allow for affordable housing development. Just over half (57.5 percent) answered yes to this question. While the City of Lomita does not provide for any of incentives, Gardena's Municipal Code follows State laws for development incentives for affordable housing. In West Hollywood, a specific housing corporation is the means through which the City finances the creation of affordable housing.

Question 23 asks if the jurisdiction's zoning ordinance describes any areas as exclusive, and the overwhelming majority of respondents answered *no* (nearly 94 percent). Representatives from Sierra Madre, Signal Hill, and South Pasadena answered *yes*. No comment data was available for this question.

Question 24 asked respondents about exclusions or discussions in the ordinance pertaining to limiting housing on the basis of any protected classes. 47 of 48 responses answered *no*, with only 1 respondent (La Puente) indicated their jurisdiction did have exclusions or discussions. No comment data was available for this question.

Question 26 asked respondents if there are standards for senior housing in the zoning ordinance. ¹¹⁹ 30 of the 47 answered *yes*, while 17 answered *no*. No comment data was available for this question.

Question 27 asked if standards comply with State or Federal law on housing for older persons, and 92 percent of respondents responded *yes*, although 24 respondents skipped this question so the sample size is much lower than on other questions. Several respondents indicated that senior housing is treated slightly differently than others, and the City of Commerce amended its zoning ordinance to allow senior housing in all residential zones in the City. La Puente's Municipal Code says that senior citizen housing is permitted with a conditional use permit in several zones throughout the jurisdiction.

Question 28 asked if the location of senior housing was treated differently than other rental or for-sale housing, and 38 of the 45 responses answered *no*, while the remaining 7 respondents responded *yes* (this latter group of respondents were from La Canada Flintridge, La Puente, Rancho Palos Verdes, Sierra Madre, Signal Hill, South Pasadena, and Temple City). One respondent said that senior housing functions as residential care facilities for the elderly that is allowed in commercial zoning districts, while another answer said that senior housing is treated the same way as other rental or for-sale housing. In Irwindale, senior housing projects are permitted subject to approval of a conditional use permit (CUP). This is a direct answer to the next question, which asks whether the zoning code distinguishes senior housing from other residential uses by the application of a CUP. 32 of the 49 answers were *no*, while the other 17 said *yes*. In one jurisdiction, there are four senior housing buildings that have been issued CUPs, and another stated that senior affordable housing is allowed only in certain, limited areas with an approval of a CUP.

Question 29 asked whether the zoning code distinguish senior citizen housing from other residential uses by the application of a CUP. 65 percent (or 32 respondents) answered *no*, with the other 35 percent (17 respondents) answered *yes*. One respondent said that the type of housing does not trigger a CUP, only the intensity of the development, while another stated that, in their jurisdiction, no CUP was required for senior housing or any other multi-family housing project. In Westlake Village, does not provide a separate standards or process for senior housing.

Question 30 asks whether he zoning code or other planning policy document addresses housing for "special needs" populations, with 39 responses saying yes and 8 saying no (this latter group of respondents were from Bell, Covina, La Canada Flintridge, La Puente, Lakewood, San Marino, South El Monte, and Walnut). Special needs populations, says one respondent, are addressed in detail in the Housing Element of the General Plan, which is mentioned by other respondents as well. Duarte, for example, has a General Plan that addresses special needs populations that identifies these as elderly, persons with disabilities, families with female heads of households, large families, the homeless, and farmworkers.

Question 31 asks if the zoning ordinance establishes occupancy standards or maximum occupancy limits that are more restrictive than state law, which incorporates the Uniform

¹¹⁹ Question 25 was eliminated from this analysis, as only 1 respondent answered the question.

Housing Code (UHC), and was answered affirmatively by only 3 respondents, while 45 out of 48 answered no. One respondent indicated that the City's Zoning Code has no such occupancy standards or limits that are more restrictive than state law, and Malibu does not even address maximum occupancy loads for structures. Another, in stating that occupancy standards and limits are regulated by the building code, does not state explicitly if these specific standards are more restrictive than state law.

Question 32 asks if the jurisdiction encourages or requires affordable housing developments to give an admission preference to individuals already residing within the jurisdiction, and 38 out of 49 (77.6 percent) answered negatively, while 11 (22.4) answered affirmatively. One jurisdiction does not take a stance one way or another with respect to the developments of affordable housing units, while another jurisdiction does encourage within the provision of any applicable law or associated project funding requirements to canvass and mail out notifications informing the community about the availability of housing within the city resulting from a new affordable housing project. Santa Monica's local preference policy includes not only residents, but also those who work in there as well, while the City of Commerce does not encourage or require that current residents receive admissions preference for new affordable housing units.

Question 33 asked respondents who answered *yes* to Question 29 if it is a requirement (presumably whether the zoning code requires a CUP for senior housing in a residential zone). While 26 simply skipped the question, of the 23 that did answer, 13 answered *no* while 10 answered *yes*. No comment data was available for this question.

Question 34 asked respondents who answered yes to Question 31 if the jurisdiction analyzes possible impacts on fair housing choice resulting from its redevelopment activities. Only 16 responses were collected, and of those, 10 answered *no* with the remaining 6 answering yes. Those answering in the affirmative were from Azusa, Commerce, Hermosa Beach, Irwindale, Lawndale, and South Pasadena. No comment data was available for this question.

Question 35 asked respondents if their respective jurisdictions' zoning ordinance included a discussion of fair housing, and three quarters responded affirmatively (37 out of 49), with one-quarter responding *no*. Several respondents made mention of their city's General Plan Housing Element and Development Code as discussing fair housing. Inglewood's zoning ordinance refers specifically to the Fair Housing Acts Amendments, while another respondent simply stated that the issue is not addressed in their municipal code.

Regional Planning and Zoning Survey Results

In the first two questions, the respondent did not see the code definitions of "family", "dwelling unit", or "residential unit" as having a discriminating effect against unrelated disabled individuals living together. The code in South Gate does not define "disability" at least as broadly as the Federal Fair Housing Act and does not consider personal characteristics such as disability.

The code in South Gate does not limit housing opportunities for disabled individuals nor are there any policies in the jurisdiction with more restrictive limits for occupancies involving disabled residents than for other occupancies of unrelated, non-disabled persons. The respondent did say that the jurisdiction has a process by which disabled persons can request reasonable accommodations to the jurisdiction's codes, rules, policies, practices, or services necessary to afford an equal opportunity to disabled persons, but did not elaborate on what that process was like.

The jurisdiction does not require a public hearing for disabled persons seeking exceptions to zoning and variances necessary for them to fully use and enjoy housing, and the zoning code does not distinguish housing for disabled persons from other residential uses by requiring a conditional use permit. There are certain development standards or special provisions in the code for making housing accessible to disabled persons, such as the fact that a minimum of 5 percent of total dwelling units (but not less than one unit) be accessible for individuals with mobility impairments. The code additionally references the accessibility requirements contained in the Fair Housing Amendments Act of 1988.

South Gate does conduct plan check for accessibility compliance of multi-family new constructions, but there is no zoning ordinance or other policy that encourages or requires the inclusion of housing units affordable to low and/or moderate income households. There does exist, however, a zoning ordinance that allows for mixed uses. The zoning ordinance in South Gate does not provide for development incentives for the provision of affordable housing beyond those provided by state law, development by right of affordable housing, or a zoning overlay to allow for affordable housing developments. No areas in the city are described in the ordinance as exclusive, and there are no exclusions or discussions in the ordinance or any planning policy that limited housing on the basis of personal characteristics covered by fair housing laws.

There are no standards for senior housing in the zoning ordinance in South Gate, and the location of senior housing is not treated differently than other rental or for-sale housing. Senior housing is not distinguished in the zoning code from other residential uses by the application of a conditional use permit nor does the code addressing housing for "special needs" populations. The ordinance does not establish occupancy standards or maximum occupancy limits that are more restrictive than state laws, and the jurisdiction does not encourage or require affordable housing developments to give an admission preference to individuals already residing in the jurisdiction. Finally, the zoning ordinance or other planning policy document includes a discussion of fair housing.

Aging Population

According to a 2015 study, LA County has about 20 seniors per 100 people of working age, but this ratio will likely double by the year 2040. The report indicated that in-home services, transportation, and in-home care will be needed in greater numbers because of this. This may also lead to an increased demand in accessible housing features and reasonable accommodations.

 $^{^{120}\} http://www.dailynews.com/social-affairs/20150330/5-ways-los-angeles-countys-population-is-changing.$

DISABILITY AND ACCESS FOCUS GROUP

Three disability and access focus groups were held at the Legal Aid Foundation of Los Angeles and Bet Tzedek Legal Services on January 10, February 1, and February 22, 2017. A number of contributing factors were discussed by attendees, including (but not limited to): availability of accessible housing options, lack of knowledge of the ADA's Right to Reasonable Accommodation, overlapping needs of people with multiple disabilities, and a long waitlist for accessible and affordable housing.

Attendees in the first focus group asked many questions about the data in the presentation, such as how recent it was and the data source from which the maps were derived. There was some confusion over the dot density maps shown and whether data was available to map homeless disabled residents in the service area. One question in particular was regarding a form of discrimination against persons with disabilities, pointing out that housing stock that purports to be accessible is not in fact accessible can be a serious problem. And disabled persons who cannot find accessible housing was seen to be a problem as well. Another attendee mentioned a potential data source for disabled residents as the County Department of Mental Health and suggested that this agency be contacted for geographically based data regarding mental disabilities. Someone voiced concerns over policy issues, such as the reasonable accommodation process with PHAs, unused vouchers by disabled residents who can't use them, and enforcement of fair housing violations.

In the second focus group, one comment addressed improving the intake process so that available housing is accessed by all the people that need it and enhancing the process for reasonable accommodations so that it is fair and equitable. Another topic that was discussed in this meeting involved the gentrifying downtown area of Los Angeles and that many homeless disabled persons were being displaced as a result.

Table IV.105 below shows organizations which were present at all three focus group meetings.

Table IV.105 Disability and Access Focus Group Organizations Attending

Meeting #1	Meeting #2	Meeting #3				
Independent Living Center of Southern	Independent Living Center of Southern	Independent Living Center of Southern				
California	California	California				
Special Needs Network Inc.	Westside Center for Independent Living	Westside Center for Independent Living				
Bet Tzedek	Bet Tzedek	Special Needs Network Inc.				
Disability Rights California	Disability Rights California	Bet Tzedek				
Alliance for Housing and Healing	Los Angeles Homeless Services Authority	Disability Rights California				
Los Angeles Housing and Community Development	City of Los Angeles	Los Angeles Homeless Services Authority				
California Association of Mortgage Brokers	Alliance for Housing and Healing	City of Los Angeles				
Mental Health Advocacy Services	Los Angeles Housing and Community Development	Villa de Vida				
Policy Link	The John Stewart Company	Mental Health Advocacy Services				
Legal Aid Foundation of Los Angeles	Mental Health Advocacy Services	Special Needs Network Inc.				
Dayle McIntosh Center	Special Needs Network Inc.	Housing Authority of the County of Los Angeles				
Housing Authority of the City of Los Angeles	Shared Use Mobility Center	LA Family Housing				
Neighborhood Legal Services of Los County	Housing Authority of the County of Los Angeles	Housing Authority of the City of Los Angeles				
Comprehensive Housing Information and Referrals for People Living with HIV/AIDS	Los Angeles County of Mental Health	South Central Las Angeles Regional Center				
Inner City Law Center	Homeless Health Care Los Angeles	Housing Works				
Shelter Partnership	Neighborhood Legal Services of Los County	Neighborhood Legal Services of Los County				
PAWS/LA	Care 1st	Los Angeles Housing and Community Development				
Communities Actively Living Independent & Free	Strength United	Communities Actively Living Independent & Free				
Community Development Commission of County of Los Angeles	PAWS/LA	Department on Disability City of Los Angeles				
	Barbour & Floyd Medical Associates	•				

H. ENFORCEMENT, OUTREACH CAPACITY & RESOURCES

FAIR HOUSING SUMMARY

HUD's fair housing complaint data from 2008 through 2016 was calculated for the Los Angeles County Service Area, during that time, the most common basis for a complaint was for some form of a disability, that being the basis for nearly twice as many complaints as the next most-common basis - race (Table IV.106). Of all complaints found with cause, disability was also the most common basis for the complaint, although not by such a runaway margin. Disability was the most common basis, cited 370 times in complaints, followed by familial status and race as the basis for 238 and 145 complaints, respectively.

Fair housing complaints were most common in 2008, when 456 were logged, and have steadily grown in number since only 186 in 2012. Other complaints during that time, besides those already listed, were largely based on familial status, retaliation, national origin, and sex. Complaints found with cause logged mostly in 2008 and 2009, when nearly a third of all complaints with cause were logged during the time period 2008 through 2016.

Table IV.106
Fair Housing Complaints by Basis

Los Angeles County Service Area
HUD Fair Housing Complaints

1100 Fair Floating Complaints										
Basis	2008	2009	2010	2011	2012	2013	2014	2015	2016	Total
Disability	186	128	136	97	98	147	120	123	159	1,194
Race	134	92	77	66	28	58	45	66	69	635
Familial Status	84	115	53	62	44	42	54	30	56	540
Retaliation	46	24	32	32	45	59	34	33	24	329
National Origin	54	38	42	50	16	20	30	23	30	303
Sex	40	22	23	19	17	21	18	21	23	204
Religion	15	11	9	7	3	5	7	8	7	72
Color	1	2	0	5	1	2	2	12	10	35
Total Basis	560	432	372	338	252	354	310	316	378	3,312
Total Complaints	456	381	306	248	186	263	230	237	303	2,610

Of the 2,610 complaints logged from 2008 through 2016, all of them were closed, dismissed or settled in a variety of ways. Nearly 57 percent of these complaints were determined to have no cause, while 564 (or 21.6 percent) of the complaints were deemed successfully settled (see Table IV.107 below). Of all complaints found with cause, the most common issue was failure to *make reasonable accommodation*, the issue being cited 290 times. The next most-commonly cited issue was *discriminatory terms*, *conditions*, *privileges*, *or services and facilities*. For further details on the Fair Housing Complaint Data, see Technical Appendix Section IV.

Table IV.107 Fair Housing Complaints by Closure

Los Angeles HUD Fair Housing Complaints

Basis	2008	2009	2010	2011	2012	2013	2014	2015	2016	Total
No cause determination	291	197	162	141	96	164	121	129	183	1,484
Conciliation/settlement successful	92	97	78	63	40	47	42	34	71	564
Complaint withdrawn by complainant after resolution	30	25	22	17	21	22	21	33	16	207
Complaint withdrawn by complainant without resolution	15	20	9	5	8	8	23	22	9	119
Complainant failed to cooperate	8	8	6	4	9	10	14	8	12	79
FHAP judicial dismissal	2	19	17	7	3	0	0	0	0	48
Unable to locate complainant	14	5	5	2	3	4	3	5	1	42
Dismissed for lack of jurisdiction	3	4	4	2	3	2	2	5	7	32
FHAP judicial consent order	0	3	0	5	3	6	3	1	0	21
Unable to locate respondent	0	0	0	1	0	0	1	0	2	4
Unable to identify respondent	0	3	0	0	0	0	0	0	0	3
Untimely Filed	0	0	0	1	0	0	0	0	1	2
DOJ dismissal	0	0	1	0	0	0	0	0	1	2
Litigation ended - discrimination found	0	0	1	0	0	0	0	0	0	1
Administrative hearing ended - discrimination found	1	0	0	0	0	0	0	0	0	1
DOJ settlement	0	0	1	0	0	0	0	0	0	1
Total Closures	456	381	306	248	186	263	230	237	303	2,610
Total Complaints	456	381	306	248	186	263	230	237	303	2,610

STATE & LOCAL FAIR HOUSING LAWS

The California State Landlord/Tenant Law states that a landlord cannot refuse rent to a tenant or engage in any other type of discrimination on the basis of group characteristics specified by law that are not closely related to the landlord's business needs. ¹²² Race and religion are examples of group characteristics specified by law. Arbitrary discrimination on the basis of any personal characteristic such as those listed under this heading also is prohibited. ¹²³ Indeed, the California Legislature has declared that the opportunity to seek, obtain and hold housing without unlawful discrimination is a civil right. ¹²⁴

Under California law, it is unlawful or a landlord, managing agent, real estate broker, or salesperson to discriminate against a person or harass a person because of the person's race, color, religion, sex (including pregnancy, childbirth or medical conditions related to them, as well as gender and perception of gender), sexual orientation, marital status, national origin, ancestry, familial status, source of income, or disability.¹²⁵ California law also prohibits discrimination based on any of the following:

- A person's medical condition or mental or physical disability; or
- Personal characteristics, such as a person's physical appearance or sexual orientation that are not related to the responsibilities of a tenant; ¹²⁶ or

¹²² For example, the landlord may properly require that a prospective tenant have an acceptable credit history and be able to pay the rent and security deposit, and have verifiable credit references and a good history of paying rent on time. (See Portman and Brown, California Tenants' Rights, pages 104, 106 (NOLO Press 2010).)

¹²³ California Practice Guide, Landlord-Tenant, Paragraph 2:553.15 (Rutter Group 2011), citing <u>Harris v. Capital Growth Investors</u> XIV (1991) 52 Cal.3d 1142 [278 Cal.Rptr. 614].

¹²⁴ Government Code Section 12921(b).

¹²⁵ Government Code Sections 12926(p), 12927(e), 12955(a),(d). See Fair Employment and Housing Act, Government Code Section 12900 and following; federal Fair Housing Act, 42 United States Code Section 3601 and following.

¹²⁶ Civil Code Sections 51, 51.2, 53; Harris v. Capital Growth Investors XIV (1991) 52 Cal.3d 1142 [278 Cal.Rptr. 614].

• A perception of a person's race, color, religion, sex, sexual orientation, marital status, national origin, ancestry, familial status, source of income, disability or medical condition, or a perception that a person is associated with another person who may have any of these characteristics.¹²⁷

Under California's Fair Employment and Housing Act and Unruh Civil Rights Act, unlawful housing discrimination may include, but is not limited to, the following examples:

- Refusing to sell, rent, or lease.
- Refusing to negotiate for a sale, rental, or lease.
- Representing that housing is not available for inspection, sale, or rental when it is, in fact, available.
- Otherwise denying or withholding housing accommodations.
- Providing inferior housing terms, conditions, privileges, facilities, or services.
- Harassing a person in connection with housing accommodations.
- Canceling or terminating a sale or rental agreement.
- Providing segregated or separated housing accommodations.
- Refusing to permit a person with a disability, at the person with a disability's own expense, to make reasonable modifications to a rental unit that are necessary to allow the person with a disability "full enjoyment of the premises." As a condition of making the modifications, the landlord may require the person with a disability to enter into an agreement to restore the interior of the rental unit to its previous condition at the end of the tenancy (excluding reasonable wear and tear).
- Refusing to make reasonable accommodations in rules, policies, practices, or services when necessary to allow a person with a disability "equal opportunity to use and enjoy a dwelling" (for example, refusing to allow a person with a disability's companion or service dog).¹²⁸

RELEVANT LOCAL & REGIONAL AGENCIES

Service Area

A review of the fair housing profile in the Los Angeles Urban County revealed that there are a number of organizations that provide fair housing services, including outreach and education, complaint intake, and testing and enforcement activities, for both providers and consumers of housing. These organizations include the U.S. Department of Housing and Urban Development (HUD), the California Department of Fair Employment and Housing (DFEH), which exists as substantially equivalent agency to HUD in the state, and the Housing Rights Center (HRC), which primarily operates in Los Angeles County.

The HRC receives a multi-year grant from HUD to conduct systemic testing in areas within Los Angeles County where statistics point to any form of discrimination covered by applicable fair housing laws and, in particular, persistent housing discrimination based on race, national origin, familial status and disability. HRC also provides intake of allegations of housing discrimination and provides resolution for housing discrimination, including mediation and

¹²⁷ Government Code Section 12955(m), Civil Code Section 51.

¹²⁸ Government Code Sections 12926(p), 12927(c)(1),(e), 12948, 12955(d); Civil Code Sections 51, 51.2, 55.1(b). See Moskovitz et al., California Landlord-Tenant Practice, Section 2.27 (Cal. Cont. Ed. Bar 2011).

litigation. Other activities include: systemic rental tests; design and construction inspections; accessibility surveys of tenants; referring tests that uncover discriminatory activity to HUD; litigation for appropriate enforcement action; fair housing counseling, investigation, and resolution for complainants; intakes of fair housing queries; training of new testers; refresher courses; reasonable accommodation/modification requests for the disabled; monitoring fair housing settlement agreements and zoning changes; as well as a host of education and outreach activities.¹²⁹

The Housing Authority of the County of Los Angeles (HACoLA) provides fair housing resources for residents via its website, such as links to file complaints of a violation of fair housing, a link to the Housing Rights Center, a link to HUD's webpage on Fair Housing and Equal Opportunity, link to the National Fair Housing Advocate Online blog, a copy of HACoLA's non-discrimination policy, and a link to information on the Assessment of Fair Housing.

Region

For the Los Angeles-Long Beach-Anaheim Region, in addition to HACoLA described above, the Fair Housing Council of Orange County "works to eliminate housing discrimination and guarantee the rights of all people to freely choose the housing for which they qualify in the area they desire." The organization provides low-cost advocacy, mediation, individual counseling, and comprehensive community education; it also maintains a hotline which available for residents to set up free consultations.

ADDITIONAL INFORMATION

Federal Fair Housing Laws

Federal laws provide the backbone for U.S. fair housing regulations. While some laws have been previously discussed in this report, a brief list of laws related to fair housing, as defined on the U.S. Department of Housing and Urban Development's (HUD's) website, is presented below:

Fair Housing Act Title VIII of the Civil Rights Act of 1968 (Fair Housing Act), as amended, prohibits discrimination in the sale, rental, and financing of dwellings, and in other housing-related transactions, based on race, color, national origin, religion, sex, familial status (including children under the age of 18 living with parents or legal custodians, pregnant women, and persons securing custody of children under the age of 18), and handicap (disability).¹³¹

Title VIII was amended in 1988 (effective March 12, 1989) by the *Fair Housing Amendments Act*... In connection with prohibitions on discrimination against individuals with disabilities, the Act contains design and construction accessibility provisions for certain new multi-family dwellings developed for first occupancy on or after March 13, 1991. 132

¹²⁹ https://portal.hud.gov/hudportal/documents/huddoc?id = FHIP2014GrantSum.pdf.

¹³⁰ http://www.fairhousingoc.org/about/

^{131 &}quot;HUD Fair Housing Laws and Presidential Executive Orders."

http://portal.hud.gov/hudportal/HUD?src=/program offices/fair housing equal opp/FHLaws

Title VI of the Civil Rights Act of 1964. Title VI prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving federal financial assistance.

Section 504 of the Rehabilitation Act of 1973 Section 504 prohibits discrimination based on disability in any program or activity receiving federal financial assistance.

Section 109 of the Housing and Community Development Act of 1974 Section 109 prohibits discrimination on the basis of race, color, national origin, sex or religion in programs and activities receiving financial assistance from HUD's Community Development Block Grant Program.

Title II of the Americans with Disabilities Act of 1990. Title II prohibits discrimination based on disability in programs, services, and activities provided or made available by public entities. HUD enforces Title II when it relates to state and local public housing, housing assistance and housing referrals.

Architectural Barriers Act of 1968 The Architectural Barriers Act requires that buildings and facilities designed, constructed, altered, or leased with certain federal funds after September 1969 be accessible to and useable by handicapped persons.

Age Discrimination Act of 1975 The Age Discrimination Act prohibits discrimination on the basis of age in programs or activities receiving federal financial assistance.

Title IX of the Education Amendments Act of 1972 Title IX prohibits discrimination on the basis of sex in education programs or activities that receive federal financial assistance. ¹³³

CONTRIBUTING FACTORS TO FAIR HOUSING ENFORCEMENT, OUTREACH, & RESOURCES

Service Area

2017 Fair Housing Stakeholder Survey

The Fair Housing Stakeholder Survey conducted from January through April 2017 was administered electronically and collected a total of 108 responses. The survey asked 37 total questions and was split into 6 sections:

- 7. Fair Housing in the County and City of Los Angeles
- 8. Federal and State Fair Housing Laws
- 9. Fair Housing Activities in the County and City of Los Angeles
- 10. Fair Housing in the Private Sector
- 11. Fair Housing in the Public Sector
- 12. Concluding Questions

^{132 &}quot;Title VIII: Fair Housing and Equal Opportunity."

http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp/progdesc/title8

^{133 &}quot;HUD Fair Housing Laws and Presidential Executive Orders."

The following tables give more information about the respondents who answered the surveys, and the narrative following the table gives more detail about how people answered the questions.

Table IV.108
Role of Respondent
2017 Fair Housing Survey Data

Primary Role	Total
Advocate/Service Provider	26
Appraisal	0
Banking/Finance	12
Construction/Development	0
Homeowner	5
Insurance	1
Law/Legal Services	22
Local Government	16
Property Management	1
Real Estate	12
Renter/Tenant	0
Service Provider	0
Other Role	7
Missing	6
Total	108

Table IV.109
What is Your Current Housing
Situation?

2017 Fair Housing Survey Data

Tenure	Total
Homeowner with Mortgage	46
Homeowner without Mortgage	7
Renter	34
Other	19
Missing	2
Total	108

In the section of the survey, most respondents (69 out of 108) answered that they were either somewhat or very familiar with fair housing laws, compared to just 11 who were not familiar with these laws (28 respondents did not answer the question). The responses for those who answered in the former category varied from life and work experience to more specific means, such as attending Community Development Commission meetings and managing a Community Development Block Grant program. In addition, several people mentioned having familiarized themselves with fair housing laws through their own study and research into the subject. The next question asked if respondents felt that fair housing laws served a useful purpose, to which 90 percent answered in the affirmative (72 out of 80 responses). 3 answered no and 5 answered don't know. Respondents were then asked if fair housing laws are difficult to understand or follow, and nearly 47 percent of the respondents (37 out of 79) answered yes. 31 respondents answered no, while the remaining 11 answers were don't know.

Respondents were then asked to list as many protected classes pertaining to fair housing and discrimination. Table IV.110, below, lists the classes mentioned in the survey in alphabetical

order along with a total count. 100 percent of respondents listed at least 1 class, and over half (54.4 percent) listed up to 4 classes.¹³⁴

Table IV.110
Protected Classes Listed
2017 Fair Housing Survey Data

Protected Class	Total
Age	27
Ancestry	3
AIDS	2
Color	7
Criminal History	1
Disability	12
Ethnicity	2
Family Status	19
Gender	43
Income	12
Marital Status	10
Military	1
National Origin	23
Race	4
Religion	35
Sexual Orientation	28

Question 8 asked respondents where they would file a complaint if they felt that their fair housing right had been violated. 12 of the 63 respondents who answered this question (45 skipped) did not know where they would file such a complaint. 13 respondents answered that they would file with HUD, while several others mentioned the local housing authority. Only 7 answered with the Housing Rights Center. The other answers varied between a smattering of local and state agencies or attorneys.

In Question 9, respondents were asked if they feel that fair housing laws are adequately enforced in the City or County and 28 out of 77 answered *no*, while 19 answered *yes*. 30 answered *don't know*, although 31 skipped the question. When asked, in the next question, if fair housing laws should be changed, 44 percent (34 out of 77) answered *don't know*. 25 answered *yes*, while 18 answered *no*. Of those who answered in the affirmative, they were asked how they should be changed and the responses varied greatly. One cogent answer included having a more accurate assessment of rental and housing market prices and processes to ensure access to the protected categories. Several of the responses dealt with rental caps in an effort to make rental housing affordable, while other respondents felt that violation of fair housing laws should be more stringently enforced.

The next question, Question 11, addressed outreach and education activities. Respondents were asked if they were aware of educational activities or training opportunities available to learn more about fair housing laws; 42 answered *yes*, while 27 answered *no*. 5 answered *don't know* and 34 skipped the question entirely. If respondents answered *yes* to this question, they were then asked if they have ever participated in fair housing activities or training. 32 answered that they had participating in such, while 18 had not. 5 said they didn't know if they had participating in these kinds of activities or training.

¹³⁴ 51 respondents skipped this answer entirely, leaving a sample size of only 57 for this question.

Closely linked to this, Question 13 asked respondents to assess the level of fair housing outreach and education activity in the County and/or City. Only 1 respondent answered that there is too much education. The majority of the answers (40 of 73) answered that there is too little outreach and education, while 11 said that there was the right amount. 21 indicated they didn't know about this kind of activity in the County or City.

Question 14 touched on fair housing testing and whether people were aware of its presence in the County or City. The majority of respondents (36 out of 73) answered that they were not aware of testing, while 24 were aware. 13 answered *don't know*. 35 simply didn't answer the question. Question 15 is closely related, and asked respondents to assess the level of fair housing testing in Los Angeles County or City, and, of those who didn't skip the question, the majority answered that they did not know (44 out of 74). Of the remaining answers, 23 answered that there is too little, 4 answered there is the right amount, and 3 answered that there is too much testing.

Questions 16-22 addressed questionable practices or barriers to fair housing choice in the private sector. The respondents' answers are outlined in Table IV.111 below. As shown there, the highest number of questionable practices or barriers to fair housing occurred in the rental housing market (33 responses), followed by the real estate and mortgage and home lending industries. Home insurance and home appraisal industries were observed to have the lowest amounts of questionable practices or barriers to fair housing choice of all industries listed.

Table IV.111

Barriers to Fair Housing in the Private Sector
2017 Fair Housing Survey Data

Question	Yes	No	Don't Know	Missing	Total
Are you aware of any que	stionable pra	ctices or bar	riers to fair ho	using choice i	n:
The rental housing market?	33	22	12	41	108
The real estate industry?	18	19	27	44	108
The mortgage and home lending industry?	16	19	31	42	108
The housing construction or accessible housing design fields?	14	19	31	44	108
The home insurance industry?	8	19	39	42	108
The home appraisal industry?	9	19	37	43	108
Any other housing services?	14	17	33	44	108

Within the rental housing market, respondents answered that they were aware of barrier to fair housing choice in housing with children (4 total), disabilities, race/ethnicity (8 total), and source or amount of income (4 total). Age and gender identity were also mentioned.

Within the real estate industry, one respondent answered regarding individuals not showing properties in areas that are mostly white and upper class, a sentiment echoed by another. Another response touched on families with children being discriminated against, as sometimes managers will mislead families by telling them occupancy is full when it in fact is not.

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¹³⁵ "Fair housing testing" was defined in the survey for respondents as often used to assess potential violations of fair housing law. Testing can include activities such as evaluating building practices to determine compliance with accessibility laws or testing if some people are treated differently when inquiring about available rental units.

Within the mortgage and home lending industry, respondents answered being aware of discrimination towards persons of color, women, and families with children. Within the housing construction or housing design field, those who answered yes gave reasons largely focusing on disability and access within housing, although others mentioned a lack of greenspace and sidewalks and building aesthetics that appear exclusionary.

Within the home insurance industry, respondents added they saw redlining and higher insurance rates for minorities. Another respondent noted that some owners of certain breeds of dogs may have limited access to home insurance coverage. Within the home appraisal industry, two respondents mentioned lower values seemed to be assessed to homes located in minority neighborhoods.

For other housing services, respondents mentioned the refusal to rent to individuals or families with a Section 8 voucher and discrimination with local utility services based on the client having a foreign accent.

Questions 23-32 addressed questionable practices or barriers to fair housing choice in the public sector. The respondents' answers are outlined in Table IV.112. As shown there, the highest number of questionable practices or barriers to fair housing choice occurred in zoning laws and public administrative actions or regulations, with occupancy standards or health and safety codes as the second most. The fields with the most answers to *no* occurred in limited access to government services, such as employment services (e.g. employment services), zoning laws, occupancy standards or health and safety codes, and permitting processes. Respondents didn't know mostly about neighborhood or community development policies, housing construction standards, and property tax policies.

Table IV.112

Barriers to Fair Housing in the Public Sector
2017 Fair Housing Survey Data

Question	Yes	No	Don't Know	Other	Missing	Total
Are you aware of any que	stionable prac	tices or barrie	rs to fair hous	sing choice	in:	
Land use policies?	14	17	26		51	108
Zoning laws?	17	19	22		50	108
Occupancy standards or health and safety codes?	15	19	24	•	50	108
Property tax policies?	11	15	30		52	108
Permitting process?	10	19	28		51	108
Housing construction standards?	10	17	30		51	108
Neighborhood or community development policies?	11	14	31	•	52	108
Limited access to government services, such as employment services?	14	20	22		52	108
Public administrative actions or regulations?	17	15	24		52	108
Barriers to affordable housing developments?	3	17	14	23	51	108

Regarding land use policies, respondents mentioned policies targeted toward homeless facilities and homeless populations in general. Other responses touched on the location of affordable housing, and how locating it in wealthy areas could lead to discriminatory policies; another mentioned the need for more density in housing, but this was limited due to the land use and zoning policies.

Regarding zoning laws, respondents mentioned zoning historically having a role in segregating people based on financial status and another mentioned the City of LA as charging an annual fee of approximately \$175 per unit to implement the density bonus law parking reduction, forcing projects to forego additional units and density bonus incentives due to administrative costs. Other respondents mentioned density limitations as having an impact on fair housing choice due to transitional or group home placement restrictions.

Regarding occupancy standards or health and safety codes, one respondent mentioned that apartment buildings with less than 5 units do not have to undergo inspection, possibly affecting fair housing choice among smaller housing developments. Several people mentioned tobacco smoke from nearby smokers and how it can be difficult to enforce a clean, breathable environment for homeowners. Another respondent mentioned that health and safety codes are hard to enforce because of a lack of resources, and specifically, investigators need better access to units in order to identify code violations.

Regarding property assessment and tax policies, respondents left comments that touched on Section 8 voucher holders not being able to afford the cost of necessary reasonable modifications and landlords in private housing not being required to help with the cost. Also, one respondent felt that a landowner with a low income should get a tax break on his or her property tax.

Regarding the permitting process, respondents observed that documents and contracts relating to this process are not always in accessible formats and are often not provided in languages other than English. Another person noted that the process was inhibiting due to its costly and complex nature and that this had a disincentivizing effect on developers from pursing projects, especially those in low opportunity areas.

Regarding housing construction standards, many respondents did feel that the building codes were too complicated and onerous to realistically abide by.

Regarding neighborhood or community development policies, several respondents mentioned the disparity of development in high opportunity areas and low opportunity areas. NIMBYism was mentioned as something that was difficult to battle. Density limitations and a failure to adequately invest in public programs to increase opportunity access were other issues discussed as well.

Regarding limiting access to government services, most respondents touched on issues pertaining to disabled residents being unable to access these services. Access to education was also mentioned, and in particular, that poor and disabled residents cannot access a computer or quality education.

Regarding public administrative actions or regulations, respondents mentioned a fence variance, rent control, lack of services (such as transport), and unequal enforcement of police procedures. Prevailing wage requirements and the general low supply of affordable housing were also mentioned.

Regarding barriers to affordable housing developments, there were more concerns about NIMBYism, the lack of land and not enough density, and simply not enough incentives for developers to build affordable housing. Other respondents mentioned the zoning and land use regulations, as many communities do not allow for multi-family developments and often replace small homes with large homes instead of denser housing.

In the concluding questions of the survey (Questions 33-36), respondents were asked first if they were aware of any fair housing ordinance, regulation, or plan in the City or County. 22 out of 51 answered *no*, 13 answered *yes*, and 16 didn't know (57 skipped the question entirely). Of those who answered in the affirmative, rent control ordinances were mentioned the most, followed by two mentions of Measure JJJ, and the Reasonable Accommodation Ordinance in the LA Municipal Code.

Question 34 asked if respondents were aware of any policies or practices for "affirmatively furthering fair housing" in the City or County of LA, and 19 out of 51 (37.3 percent) answered no, 14 answered yes, and 18 didn't know (while 57 skipped the question). Of the comments left by respondents, the Fair Housing Plan, Assessment of Fair Housing, and Analysis of Impediments to Fair Housing Choice were all mentioned. Someone also mentioned seeing relevant policies in the County's Consolidated Plan. Another respondent did not mention specifics, only that many policies intended to create clean and safe housing for tenants are actually being used for other reasons and the outcome clogs the legal system.

In Question 35, respondents were asked if there are specific areas in the County or City that have fair housing problems, and only 5 out of 52 responses said *no*, while 23 said *yes*. 24 respondents didn't know and 56 skipped the question entirely. Of those that answered in the affirmative, the following cities and geographic areas were identified: Glendale, Valley Village, Studio City, City of Los Angeles, West Hollywood, Santa Monica, San Fernando Valley, South Los Angeles, East Los Angeles, Pacoima, San Fernando, Downtown Los Angeles/Skid Row, Culver City, Torrance, Redondo Beach, Manhattan Beach, areas along the Expo Metro Line, all areas in the County, Santa Clarita Valley, and MacArthur Park area.

Finally, respondents were asked to share additional comments regarding fair housing, and nine answers were collected. The main themes consisted of disparities in access to quality schools and jobs, a lack of private investment (e.g. grocery stores and other healthy food options) in low-income areas, more translation of official documentation into other languages, and protection from discrimination for Section 8 clients. Another respondent mentioned the City's policies having a limiting effect on fair housing, and still another expressed gratitude towards adding a voice to the issue.

For more information and results of the 2017 Fair Housing Survey, see Technical Appendix Volume II.

Region

For the Los Angeles-Long Beach-Anaheim Region, pertinent factors include communication with the public from a given agency or organization, which can be hindered by failing to disseminate necessary details for public engagement on its webpage or via social media engagement. This factor may impact all the housing issues listed above, as it directly has an effect on who is present at community meetings and which voices help shape policy through direct interaction with the local politicians and policy makers. Another factor to consider is inadequate resource allocation with a given organization or agency. This may result in not enough bodies present to answer a phone or reply to emails, thus inhibiting that agency's efficiency and expedition at responding to needs within its jurisdiction. This factor may directly impact disproportionate housing needs, as it may render said agency impotent to advocate for those residents laden with exceptional or unreasonable housing burdens.

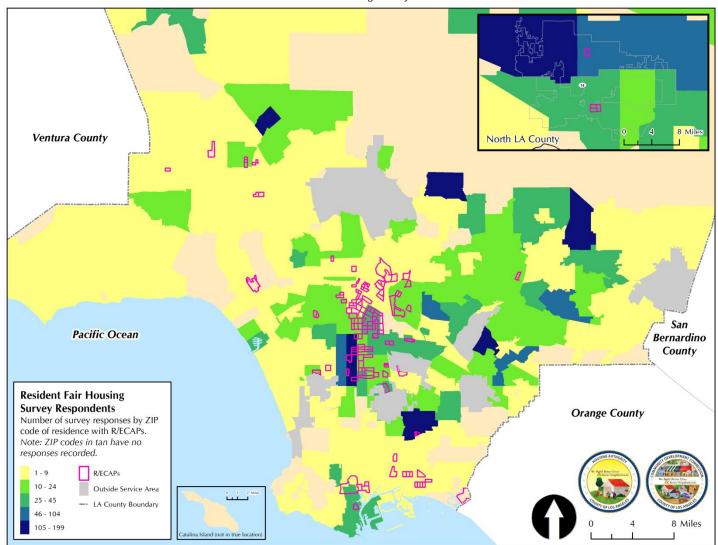
I. RESIDENT FAIR HOUSING SURVEY RESULTS

The following section analyzes the results from the 2017 Resident Fair Housing Survey for the Los Angeles County Service Area. A total of 6,290 responses were collected and analyzed, and following this analysis, separate sections will parse respondent data from the HACoLA and the Urban County service areas separately (this analysis begins on page 438).

Map IV.217 on the following page shows where the respondents live by ZIP code, with darker shades ZIP codes indicating higher numbers of respondents. As seen there, the majority of respondents are from the northern portion of the County near Lancaster and scattered around the central portion of the County, particularly near San Fernando, Altadena, Azusa, Pico Rivera, Paramount, and Westmont. Two ZIP codes containing R/ECAPs show particularly high numbers of respondents: Westmont and Paramount.

The tables and accompanying narrative beginning on page 423 following the map summarize the findings of the responses from the Los Angeles County Service Area, while further detail and granularity from the 2017 Resident Fair Housing Survey can be found in Technical Appendix Volume II.

Map IV.217
Survey Responses by ZIP Code
Los Angeles County Service Area
Fair Housing Survey



Data Sources: Resident Fair Housing Survey, County of Los Angeles, Census Tigerline, Esri

Table IV.113 summarizes the housing type of respondents, with more than one in three respondents living in single-family detached homes. The next most-common dwelling unit for respondents was in mid-rise apartment buildings (defined here as between 1 and 4 stories) – nearly 30 percent of respondent lived in such a building. Fewer than four percent of respondents lived in high-rise apartment buildings.

Table IV.113
Which of the following best describes the type of housing you currently live in?

Los Angeles County Service Area Fair Housing Survey

Housing	Responses
Single-family home (detached)	2,311
Apartment building with 1-4 stories	1,919
Missing	664
Twin-home or duplex	441
Something else, please specify	417
Condo/Townhouse	317
Apartment building with 5 or more stories	221
Total	6,290

In Table IV.114 below, of the respondents who are living in public housing, the majority lived in tenant based Section 8, while only a small percentage lived in project based Section 8 housing. A large portion of those respondents to whom the question did apply indicated they lived in Public Housing.

Table IV.114

Do you live in a type of assisted housing other than public housing, if so what type is it?

Los Angeles County Service Area

Fair Housing Survey

Туре	Responses
Does not apply	2,523
Missing	1,396
Tenant based Section 8	752
Public Housing	552
Don't know	512
Multi-family Section 8	260
Project based Section 8	164
Other	131
Total	6,290

Table IV.115 below summarizes how long respondents have lived in their respective neighborhoods. The largest proportion of respondents indicated living in their neighborhood between 1 and 5 years (22.3 percent), with only about 7 percent having lived in their neighborhood less than 1 year. Just over 47 percent of the respondents indicated having lived in their neighborhood between 6 and 30 years.

Table IV.115
How long have you lived in your neighborhood?

Los Angeles County Service Area Fair Housing Survey

Time	Responses
1-5 years	1,404
6-10 years	1,166
11-20 years	1,020
21-30 years	782
More than 30 years	772
Missing	711
Less than 1 year	435
Total	6,290

Table IV.116 below shows respondents' answers when asked about their respective decisions to live in their particular neighborhood. The top answer was concerning affordability of the housing, while other popular reasons included proximity to family and friends, safety of the neighborhood, and proximity to work. Respondents also mentioned accessibility to goods and services as a reason to live in their neighborhood. Only a small number of respondents indicated access to job opportunities or physical accessibility of housing as reasons.

Table IV.116
Which of the following were the most important reasons you decided to live in your neighborhood? (Check all that apply)

Los Angeles County Service Area Fair Housing Survey

Reason	Responses
Affordability of housing	2,138
To live near family and friends	1,733
Safety in the neighborhood	1,603
Accessibility of goods and services, such as neighborhood centers and stores	1,365
To be close to work	1,331
To be near public transportation	1,081
Nearby schools for my children/grandchildren	998
No choice/ Nowhere else to go	765
I grew up here	655
Access to job opportunities	427
Physical accessibility of the building	400

In Table IV.117, respondents were asked about their perceived level of safety in their neighborhood in the daytime versus the night. Regarding daytime walking through their neighborhood, most respondents indicated they feel either safe or very safe; however, at night, the responses shifted dramatically so that most respondents indicated feeling either somewhat safe or not safe walking through their neighborhood. Of all the respondents for whom the question applied, most indicated feelings of safety walking through their housing development during the day, while a greater number felt more danger at night. However, the shift from day to night is not as dramatic as for respondents indicating neighborhood safety.

Table IV.117 Perceptions of Safety

Los Angeles County Service Area Fair Housing Survey

Response	Not safe	Somewhat Safe	Safe	Very Safe	Does Not Apply	Missing	Total
How safe would you say you fell walking in your neighborhood during the day time?	537	1,368	1,798	1,946		641	6,290
How safe would you say you feel walking in your neighborhood at night?	1,523	1,847	1,347	888		685	6,290
How safe would you say you feel walking in your public housing development during the day time?	326	630	997	920	2,339.	1,078	6,290
How safe would you say you feel walking in your public housing development at night?	678	697	805	584	2,398.	1,128	6,290

As shown below, most respondents (54 percent) indicated they would continue to live in their current city or neighborhood if given the choice. Just over 21 percent of respondents indicated in the negative, with other respondents indicating *not sure* or omitting the question entirely.

Table IV.118
If you had a choice would you continue to live in your city or neighborhood?

Los Angeles County Service Area Fair Housing Survey

Yes/No	Responses
Yes	3,399
No	1,340
Not Sure	858
Missing	693
Total	6,290

Table IV.119 below takes an in-depth look at how respondents feel about different aspects of their neighborhood or housing development, with questions ranging from cleanliness, the condition of the built environment, and accessibility and availability of transportation and housing (sorted by the column *Excellent*). A majority of respondents seemed to think highly of their places of residence, as the majority of the answers were in the "Very Good" category, with only a small number being either "Fair" or "Poor." The highest number of respondents rating an aspect as "Excellent" can be seen in the question regarding accessibility to public transportation. There were very good ratings also for the condition of the buildings and public spaces. The lowest ratings came when evaluating the availability of quality of public housing and job opportunities.

Table IV.119

How would you rate each of the following aspects of your neighborhood/housing development?

Los Angeles County Service Area
Fair Housing Survey

Aspects	Excellent	Very Good	Good	Fair	Poor	Don't Know	Missing	Total
Access to public transportation	941	2,327	1,212	629	345	75	761	6,290
Cleanliness	659	1,839	1,124	762	270	22	1,614	6,290
Condition of the public spaces	649	2,282	1,296	762	423	100	778	6,290
Condition of the buildings (including homes)	629	2,364	1,378	811	258	37	813	6,290
Schools in the neighborhood	561	1,911	1,084	700	760	444	830	6,290
Condition of streets and sidewalks	422	1,781	1,506	1,281	504	16	780	6,290
Availability of quality public housing	416	839	652	929	1,676	831	947	6,290
Availability of job opportunities	318	938	981	1,143	1,344	599	967	6,290

Table IV.120 below shows responses on geographic accessibility of common neighborhood amenities, such as parks, grocery stores, churches, and recreational facilities, sorted on the first column. As seen there, most respondents indicated a high degree of ease with accessing most of the places listed in the table, with the lowest number being for ease of getting around a neighborhood or housing complex (for households with a disability). Other places rated as difficult in high numbers were places with jobs that a household would want to have.

Table IV.120
Please indicate how easy it would be for you to get to each of the following places?

Los Angeles County Service Area
Fair Housing Survey

Place	Easy	Moderately Difficult	Difficult	Don't Know	Missing	Total
Supermarkets or grocery stores	4,390	716	333	28	802	6,290
Pharmacies	4,238	776	332	70	839	6,290
Banks and credit unions	4,090	847	382	72	855	6,290
Parks, playgrounds or other green spaces	4,060	781	357	169	818	6,290
Public Libraries	4,034	763	289	181	873	6,290
Churches, mosques, synagogues, or other religious or cultural centers	3,902	736	279	286	828	6,290
Community center or recreational facilities	3,203	987	444	411	874	6,290
Places with jobs that I/my household would want to have	1,703	1,162	1,008	964	947	6,290
If household with a disability, ease of getting around your neighborhood/housing complex	1,672	931	659	1,150	1,140	6,290

In Table IV.121, respondents were asked about their tenure in housing, with nearly an even proportion of respondents indicating either home ownership (27 percent), renting from a landlord (26 percent), or renting from the Housing Authority (25 percent). Only a very small percentage (just over 1.5 percent) indicating room share through owning or renting.

Table IV.121
Do you currently rent you home, own your home or something else?

Los Angeles County Service Area Fair Housing Survey

Own/Rent	Responses
Own	1,692
Rent from a private landlord	1,617
Rent from the Housing Authority	1,572
Missing	868
Something else	263
Rent a room	175
Renter: share a room	60
Owner: share a room	43
Total	6,290

The next question asked respondents to rate satisfaction levels with current housing, and the largest proportion of the residents indicated the highest level of satisfaction on the scale (just over 45 percent). The lowest number of answers (not counting *Don't know*) were for the lowest level of satisfaction (only around 9 percent).

Table IV.122

How satisfied would you say you are with the quality of the housing you currently live in?

Satisfaction	Responses			
Satisfied	2,855			
Somewhat satisfied	1,302			
Missing	791			
Somewhat dissatisfied	652			
Dissatisfied	586			
Don't know	104			
Total	6,290			

In Table IV.123 below, residents are asked whether or not their rent has been paid by a rental assistance program in the past five years, with the majority answering in the negative (56 percent). Only roughly 21 percent of respondents answered that they had used a rental assistance program in the past five years.

Table IV.123
In the past five years has your rent been paid by a rental assistance program?

Los Angeles County Service Area Fair Housing Survey

Tan Hodoling Carvey		
Own/Rent	Responses	
Yes	1,320	
No	3,523	
Don't know	434	
Missing	1,013	
Total	6,290	

Of those who answered the above question in the affirmative, these residents were asked about difficulty in using their Section 8 voucher, with more respondents answered in the negative.

Table IV.124
If you answered "Yes" to the above question have you had difficulty using that Section 8 voucher?

Los Angeles County Service Area Fair Housing Survey

	r an riodoing curvey			
Own/Rent Responses				
	Yes	340		
	No	1,338		
	Don't know	789		
	Missing	3,823		
	Total	6.290		

Table IV.125 below compiles answers from residents asked about changing housing costs, and the data show the largest proportion of respondents indicating that the overall costs have increased either some or a lot (50 percent). While only 5 percent answered that costs had actually decreased either some or a lot, nearly 20 percent indicated that their housing costs had stayed about the same in the past three years.

Table IV.125

During the past three years, how have the overall housing costs for your current home changed?

Change in housing cost	Responses
Increased a lot	1,135
Increased some	2,011
Stayed about the same	1,232
Decreased some	225
Decreased a lot	78
Not applicable	678
Missing	931
Total	6,290

Related to the above question, residents were next asked if they had been displaced from their place of dwelling in the past 10 years. Among renters, a far greater number replied that they had been displaced, while the same was true for homeowners. Only 12 percent of respondents had been displaced from housing in the last ten years.

Table IV.126
Have you been displaced from your housing within the last 10 years?

Los Angeles County Service Area Fair Housing Survey

Yes/No	Responses
Yes, as a renter	633
No, as a renter	2,636
Yes, as an owner	116
No, as an owner	1,526
Don't remember	334
Missing	1,045
Total	6,290

Of those who answered "Yes" to the question of displacement, Table IV.127 shows the reason for this displacement. While the vast majority of respondents did not answer the question, most indicated some other reason than the property being purchased, demolished, improved or renovated, or foreclosed.

Table IV.127
If you answered "Yes" to the above question was this the result of the property being:

Los Angeles County Service Area Fair Housing Survey

I all Housing Survey				
Reason Responses				
Missing	5,315			
Other	494			
Purchased	215			
Improved/renovated	121			
Foreclosed	103			
Demolished	42			
Total	6,290			

Residents were then asked if, in the past five years, they had looked for a new place to live, and the majority of the responses were in the negative. Of those who answered they had looked for a new place to live, most were looking to buy over renting. See Table IV.128 below for a complete breakdown of responses.

Table IV.128 During the past five years, have you looked for a new place to live?

Los Angeles County Service Area Fair Housing Survey

Yes/No	Responses
Yes, looked for a home to rent	1,638
Yes, looked for a home to buy	728
No	2,922
Don't remember	106
Missing	896
Total	6,290

In the next question, residents were asked if they had difficulty in finding quality and affordable housing in a neighborhood of their choosing, to which most responses were in the affirmative (for a home to rent). Roughly half of respondents omitted the question entirely.

Table IV.129

If you answered "Yes" to the above question did you have trouble finding safe, quality housing that you could afford in a neighborhood you would like to live in?

Los Angeles County Service Area Fair Housing Survey

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Property	Responses			
Yes, looked for a home to rent	1,859			
No 877				
Don't remember	357			
Missing	3,197			
Total	6,290			

Of those who answered that they encountered difficulty in finding housing related to the previous question, most respondents felt it was because of source of income, followed by race/ethnicity and then familial status (see Table IV.130 below).

Table IV.130
If you could not find safe, affordable, quality housing do you think it was because (Check all that apply):

Los Angeles County Service Area Fair Housing Survey

Category	Responses
Source of income	775
Race/ethnicity	377
Familial Status	225
Disability	192
Age	168
Criminal History/Record	137
Pregnant or having children	103
Marital Status	81
Sex/Gender	77
Religion	56
Sexual Orientation	53
National Origin	45
Ancestry	35

Table IV.131 below shows answers from when residents were asked if they had been discriminated against because of a number of factors, selecting all that apply. Similar to the question above, most respondents felt that they had been discriminated on the basis of race/ethnicity, with other notable factors being source of income and disability.

Table IV.131

Do you believe that you have been discriminated against in your housing because of any of the following (Check all that apply):

Category	Responses
Race/ethnicity	386
Source of income	318
Disability	164
Age	133
Familial Status	129
Sex/Gender	87
Criminal History/Record	82
Pregnant or having children	79
Marital Status	76
Religion	70
Sexual Orientation	65
National Origin	59
Ancestry	37

Table IV.132 below compiles the answers from residents who were asked about fair housing complaints and if, upon suspected discrimination by a landlord, residents filed a complaint and if they were satisfied with the outcome. The majority of those who had been the victim of discrimination had not filed a complaint, and of those who had, the majority were not satisfied with the outcome of such an action.

Table IV.132
Fair Housing Complaints
Los Angeles County Service Area
Fair Housing Survey

Complaints	Yes	No	Don't Know	Does Not Apply	Missing	Total
If you have ever been discriminated by your landlord, did you complain?	353	1,436	163	2,645	1,693	6,290
Were you satisfied with the outcome?	320	555	159	2,851	2,405	6,290

For residents who had filed a complaint, they were asked with whom the complaint was filed and, among the three choices presented, there was an approximately even split. Slightly more people had filed with the Housing Rights Center, with slightly fewer residents filing with the California Department of Fair Employment and Housing and the U.S. Department of Housing and Urban Development.

Table IV.133
If you ever filed a fair housing complaint with an agency which one (Check all that apply):

Los Angeles County Service Area Fair Housing Survey

Complaint Agency	Responses
Housing Rights Center	143
California Department of Fair Employment & Housing	112
U.S. Department of Housing and Urban Development (HUD)	138

Table IV.134 below compiles answers for residents who were asked whether or not they applied for home loans. Most respondents answered "no" to the question, but of those who did, most said the application made was approved.

Table IV.134 Home loan Applications

Los Angeles County Service Area Fair Housing Survey

Satisfaction	Yes	No	Don't Know	Does Not Apply	Other	Missing	Total
During the past five years have you applied for a loan to purchase a home, to refinance your mortgage, or take equity out of your home?	894	3,081	112	1,077		1,126	6,290
Was the application you made during the past five years approved?	799	471	168	2,582	77	2,193	6,290

For those whose application was not approved, the survey next asked residents to give a reason why, and most respondents indicated that income level was the primary reason. The next-highest reason given involved credit history or credit score.

Table IV.135
If you have ever applied for a home loan and your application was NOT approved, which of the following reasons were you given? (Check all that apply):

Los Angeles County Service Area Fair Housing Survey

r an riodeing curvey				
Reason	Responses			
My/our income level	434			
My/our credit history or credit score(s)	272			
The amount I/we had for a down payment	177			
How much savings I/we had	134			
The value of my property	84			

Residents were then asked to choose from any limiting factors in their choice of housing, and most respondents indicated affordability of rent or mortgage as the primary consideration. Related to this, the second-most respondents answered that the amount of money they had for a deposit as a limiting factor.

Table IV.136
Which of the following issues, if any, limited the housing options you were able to consider (Check all that apply):

Los Angeles County Service Area Fair Housing Survey

Issue	Responses
What I/we could afford to pay our rent or mortgage	1,915
The amount of money I/we had for deposit	967
My/our credit history or credit score	648
Housing large enough for my/our household	473
Not being shown housing in the neighborhood(s) I wanted to move into	315
Units that accommodate my/our disability	274
Concern that I/we would not be welcome in a particular neighborhood(s)	213

As shown below in Table IV.137, the largest age cohort represented in the sample of residents was aged 62 and older. Only about 12 percent of the group was under the age of 34.

Table IV.137 What is your age?

Age	Responses
Under 18	20
18-24	152
25-34	613
35-45	925
46-54	932
55-61	795
62 and older	1,856
Missing	997
Total	6,290

Table IV.138 below shows questions regarding disability and accommodation and whether or not the respondent (or anyone in his/her household) was living with a disability, with the majority answered in the negative. However, roughly 30 percent of respondents did indicate living with a disability (or with someone else in their household with a disability). Most respondents did not indicate having any problems creating physical accessibility issues in the home. The largest share of respondents were aware of their right to ask for reasonable accommodations, but a large proportion were not (roughly 33 percent). About half the respondents had not made a request for a reasonable accommodation with their landlord.

Table IV.138
Disability and Accommodation

Los Angeles County Service Area Fair Housing Survey

Disability & Accommodation Question	Yes	No	Don't Know	Missing	Total
Are you, or someone else in your household, living with a disability?	1,783	3,269	207	1,031	6,290
Are there any problems within your home that create any physical/accessibility issues for yourself or a family member?	553	4,343	356	1,038	6,290
Are you aware of your right to request from your landlord a change in rules or policies and your right to request a physical change to your housing to make your home more accessible if necessary due to a disability?	1,973	1,534	1,038	1,745	6,290
Have you made a request for reasonable accommodation?	559	3,407	476	1,848	6,290

Table IV.139 below shows how respondents answered the question regarding requests for reasonable accommodation. While the majority of respondents did not answer, of those that did, most answered the "Other" category, which mainly consisted of parking, sanitation, and only a few accessibility issues. The next most-popular option selected by respondents was for a modification of some kind to the unit.

Table IV.139
If you made a request for a reasonable accommodation, what type of accommodation did you request?

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Accommodation	Responses
Missing	5,310
Other	431
Modification of unit	116
Parking/parking space related	95
Transfer to another unit	75
Assistance animal	60
Accessibility of unit	60
Size of unit	55
Change in rent due data	47
Live in attendant	41
Total	6,290

Table IV.140 below shows answers of whether or not respondents were happy with the outcome for a reasonable modification request, and for those for whom the question was applicable, slightly more answered in the negative, although it was about an even split between those who were satisfied and those who were not.

Table IV.140
Where you satisfied with the outcome of your accommodation and/or modification request?

Los Angeles County Service Area

all riousing ourvey		
Yes/No	Responses	
Yes	431	
No	478	
Don't know	461	
Missing	4,920	
Total	6,290	

The majority of residents who are homeowners or developers were not aware of their rights to request a reasonable accommodation involving land use zoning, as evidenced by the data below in Table IV.142. Additionally, more respondents indicated they didn't know if they had a right than those who indicated they were aware of such a right.

Table IV.141

If you are a homeowner or developer, are you aware of your right to request a reasonable accommodation involving land use zoning?

Los Angeles County Service Area Fair Housing Survey

Yes/No	Responses
Yes	454
No	853
Don't know	643
Does not apply	1,886
Missing	2,454
Total	6,290

Table IV.142 shows responses regarding educational attainment among the respondents, and as shown there, the largest proportion of residents who completed the survey had completed some college education (but no degree). Of those who answered the question, roughly one quarter had completed college or some higher degree.

Table IV.142 What is the highest level of school that you have completed?

Los Angeles County Service Area Fair Housing Survey

Education	Responses
Grade school or some high school	945
High school degree or equivalent	832
Completed vocational/technical school	401
Some college but no degree	1,235
Bachelor's degree	943
Master's degree or higher	585
Missing	1,349
Total	6,290

Respondents were asked next to indicate their work status, and of those who answered the question, the largest number was employed full-time, with about 17 percent of respondents being retired. Only a very small percentage indicated they were unemployed and not currently looking for work.

Table IV.143
Which of the following describes your current status?

Los Angeles County Service Area Fair Housing Survey

Employment	Responses
Employed full-time	1,624
Missing	1,358
Retired	1,095
Unable to work due to a disability	798
Employed part-time	472
Unemployed and looking for work	301
Other	267
Stay-at-home caregiver or parent	205
Student	105
Unemployed and not looking for work	65
Total	6,290

The next question asked whether the respondent had ever been homeless, to which over half answered in the negative. Only about 16 percent of respondents had been homeless in the past.

Table IV.144 Have you ever been homeless?

Los Angeles County Service Area Fair Housing Survey

Yes/No	Responses
Yes	999
No	3,788
Don't know	59
Does not apply	182
Missing	1,262
Total	6,290

Of those who had been homeless, the majority filled in their own responses comprised mainly of reasons pertaining to job loss, illnesses, and evictino. The vast majority of respondents omitted the question due to not being applicable to their situation.

Table IV.145
If you have been homeless, what led to your homelessness?

r an riodoning Carvey			
Reason	Responses		
Missing	5,084		
Other	583		
Loss of your job	275		
Illness/hospitalization	134		
Eviction	128		
Substance abuse issue	59		
Jail/prison	27		
Total	6,290		

Table IV.146 below shows the primary languages spoken in respondents' homes, with English being the most common. Spanish was the next-most common language spoken. Only around 3 percent of residents spoke either Chinese, Russian, or Korean as the primary language at home.

Table IV.146
What is the primary language you use at home?

Los Ángeles County Service Area Fair Housing Survey

	oning Curvey
Language	Responses
English	3,820
Spanish	1,046
Chinese	110
Russian	59
Korean	28
Other	222
Missing	1,005
Total	6,290

Most respondents who answered the next question indicated they had received their lease agreement or other important documents in their primary language. Only a small proportion indicated they had not received these documents in their primary language.

Table IV.147
If you requested your lease agreement or other important documents in your primary language we they provided?

Los Angeles County Service Area Fair Housing Survey

	g
Yes/No	Responses
Yes	2,004
No	449
Did not request	2,025
Missing	1,812
Total	6,290

Most residents indicated they had been able to communicate with their landlord, while only a small number said either they had not communicated or they had not requested communication. Roughly half the respondents did not answer this question at all.

Table IV.148 Have you been able to communicate with your landlord?

Los Angeles County Service Area Fair Housing Survey

ran riodonig carvoy				
Yes/No	Responses			
Yes	2,860			
No	673			
Did not request	403			
Missing	2,354			
Total	6,290			

Of the respondents who answered the next question, nearly one-half did not consider themselves to be Hispanic, Latino/Latina, or of Spanish origin. About 30 percent did consider themselves to be this ethnicity, while a large portion of residents omitted the question. In Map IV.217 on page 422, we see that a relatively small proportion of respondents live in areas of racial or ethnic concentration, so the fact that such a large proportion was Hispanic is a bit surprising.

Table IV.149

Do you consider yourself Hispanic, Latino, Latina or of Spanish origin?

Los Angeles County Service Area Fair Housing Survey

Yes/No	Responses
Yes, Hispanic/Latino/Latina, or of Spanish origin	2,029
No, not of Hispanic/Latino/Latina, or of Spanish	2,833
Missing	1,428
Total	6,290

Table IV.150 shows respondents' answers of race, with the majority of these being White, and the second-most racial category being Black. Only a small percentage indicated they were Asian or another race.

Table IV.150
What is your race? (Check all that apply)

Los Angeles County Service Area Fair Housing Survey

Race		Responses
America	n Indian or Native Alaskan	227
Asian		379
Black or	African American	1,221
Native F	lawaiian or Pacific Islander	49
White		2,208

Over twice as many respondents were female than were male according to Table IV.151 below. A small percentage indicated they were either transgender, other, or preferred not to answer.

Table IV.151
What is your Gender?

Gender	Responses
Male	1,685
Female	3,422
Transgender	21
Other	15
Prefer not to answer	94
Missing	1,053
Total	6,290

The 2016 incomes of respondents varied greatly, as shown below in Table IV.152. The majority of residents earned between \$30,001 and \$50,000 in income, with many more respondents earning much less than this amount. The largest group of respondents, as indicated in the table, declined to answer the question. Only a very small percentage (about 2 percent) earned more than \$100,000 in 2016 income.

Table IV.152
What was your household income in 2016?

Los Angeles County Service Area Fair Housing Survey

Income	Responses
Less than \$10,000	539
\$10,001 to \$20,000	937
\$20,001 to \$30,000	416
\$30,001 to \$50,000	534
\$30,001 to \$50,000	736
\$50,001 to \$100,000	407
\$100,001 to \$200,000	121
More than \$200,000	0
Missing	2,600
Total	6,290

Table IV.153 and

Table IV.154 below shows respondents' perceptions of racial and ethnic homogeneity in the neighborhood, and there seemed to be a fairly even split between the percentiles listed, with the largest group of respondents estimating they lived in a neighborhood or housing development with between 40 and 60 percent of residents being of the same race. Given that not many responses have been collected from R/ECAP areas (see Map IV.217 on page 422), this would seem to indicate that there is a high degree of similarity in race and ethnicity outside these areas of poverty.

Table IV.153
If you had to guess, what percent of the people in your neighborhood/housing development do you think are the same race as you?

Los Angeles County Service Area Fair Housing Survey

Percent	Responses
0 - 10%	742
10.1% - 20%	641
20.1% - 40%	790
40.1% - 60%	1,023
60.1% - 80%	972
80.1% - 100%	810
Missing	1,312

Total	6,290

Table IV.154

If you had to guess, what percent of the people in your neighborhood/ housing development do you think are the same ethnicity as you?

Los Angeles County Service Area Fair Housing Survey

r am riodonig Garroy				
Percent	Responses			
0 - 10%	867			
10.1% - 20%	722			
20.1% - 40%	802			
40.1% - 60%	915			
60.1% - 80%	894			
80.1% - 100%	671			
Missing	1,419			
Total	6,290			

HACoLA Survey Results

The following tables are a sample of responses from residents living in the HACoLA service area. Note that the following tables are a subset of responses culled from the data show in the tables above. In Table IV.155, respondents' answers to perceptions of safety are outlined, with most respondents (almost 60 percent) indicating feeling safe or very safe walking in their neighborhood during the daytime. A significant shift occurs at night, when a combined 53 percent of respondents indicated feeling either somewhat safe or not safe walking through their neighborhood at night.

Table IV.155
Perceptions of Safety

Housing Authority of the County of Los Angeles Service Area Fair Housing Survey

Response	Not safe	Somewhat Safe	Safe	Very Safe	Does Not Apply	Missing	Total
How safe would you say you fell walking in your neighborhood during the day time?	529	1,352	1,778	1,922		630	6,211
How safe would you say you feel walking in your neighborhood at night?	1,500	1,832	1,334	870		675	6,211
How safe would you say you feel walking in your public housing development during the day time?	322	626	987	913	2,301.	1,062	6,211
How safe would you say you feel walking in your public housing development at night?	670	694	797	579	2,358.	1,113	6,211

Over 66 percent of respondents in the HACoLA service area had not been displaced from their housing in the last 10 years, while almost 12 percent had.

¹³⁶ For a complete listing of response tables from respondents living in the HACoLA service area, see Technical Appendix Volume II.

Table IV.156
Have you been displaced from your housing within the last 10 years?

Housing Authority of the County of Los Angeles Service Area Fair Housing Survey

Displaced	Responses
Yes, as a renter	624
No, as a renter	2,605
Yes, as an owner	115
No, as an owner	1,506
Don't remember	329
Missing	1,032
Total	6,211

The largest group of respondents who indicated some form of discrimination claimed the basis to be race or ethnicity, while the next most-common answered involved source of income.

Table IV.157
Do you believe that you have been discriminated against in your housing because of any of the following (Check all that apply): Housing Authority of the County of Los Angeles Service Area

Fair Housing Survey

Category	Responses
Race/ethnicity	380
Source of income	310
Disability	161
Age	130
Familial Status	123
Sex/Gender	86
Criminal History/Record	81
Pregnant or having children	77
Marital Status	75
Religion	70
Sexual Orientation	64
National Origin	58
Ancestry	37

Most respondents who claimed to be the victim of discrimination by a landlord had not complained about the incident (over 80 percent of those who had experienced discrimination of some kind). More respondents were *not* satisfied with the outcome than those who were satisfied with the outcome.

Table IV.158
Fair Housing Complaints

Housing Authority of the County of Los Angeles Service Area Fair Housing Survey

Complaints	Yes	No	Don't Know	Does Not Apply	Missing	Total
If you have ever been discriminated by your landlord, did you complain?	351	1,413	161	2,614	1,672	6,211
Were you satisfied with the outcome?	317	547	159	2,813	2,375	6,211

Los Angeles Urban County Survey Results

The following tables are a sample of responses from residents living in the Los Angeles Urban County. In Table IV.159, respondents' answers to perceptions of safety are outlined, with most respondents (over 66 percent) indicating feeling safe or very safe walking in their neighborhood during the daytime. A significant shift occurs at night, when a combined 52 percent of respondents indicated feeling either somewhat safe or not safe walking through their neighborhood at night.

Table IV.159
Perceptions of Safety
Los Angeles Urban County
Fair Housing Survey

Response	Not safe	Somewhat Safe	Safe	Very Safe	Does Not Apply	Missing	Total
How safe would you say you fell walking in your neighborhood during the day time?	131	403	660	683		145	2,022
How safe would you say you feel walking in your neighborhood at night?	414	634	500	313		161	2,022
How safe would you say you feel walking in your public housing development during the day time?	101	174	294	272	837.	344	2,022
How safe would you say you feel walking in your public housing development at night?	197	213	229	160	856.	367	2,022

Over 73 percent of respondents in the Urban County had not been displaced from their housing in the last 10 years, while almost 12 percent had.

Table IV.160
Have you been displaced from your housing within the last 10 years?

Los Angeles Urban County Fair Housing Survey

Displaced	Responses
Yes, as a renter	133
No, as a renter	675
Yes, as an owner	45
No, as an owner	802
Don't remember	80
Missing	287
Total	2,022

The largest group of respondents who indicated some form of discrimination claimed the basis to be race or ethnicity, while the next most-common answered involved source of income.

Table IV.161

Do you believe that you have been discriminated against in your housing because of any of the following (Check all that apply):

Los Angeles Urban County Fair Housing Survey

Category	Responses
Race/ethnicity	87
Source of income	70
Disability	30
Age	29
Familial Status	20
Sex/Gender	17
Marital Status	17
Criminal History/Record	15
National Origin	13
Religion	11
Sexual Orientation	10
Pregnant or having children	8
Ancestry	4

Most respondents who claimed to be the victim of discrimination by a landlord had not complained about the incident (over 86 percent of those who had experienced discrimination of some kind). More respondents were *not* satisfied with the outcome than those who were satisfied with the outcome.

Table IV.162 Fair Housing Complaints

Los Angeles Urban County Fair Housing Survey

Complaints	Yes	No	Don't Know	Does Not Apply	Missing	Total
If you have ever been discriminated by your landlord, did you complain?	67	420	27	960	548	2,022
Were you satisfied with the outcome?	71	106	40	973	832	2,022

J. SUMMARY

The following text borrows from each section the Fair Housing Analysis, summarizing the main findings present in the data and maps.

In the Los Angeles County Service Area, Hispanics represent the largest single racial or ethnic category, with over 4.3 million residents, or almost 48 percent of the overall population. Hispanics have grown steadily in overall numbers and in share of the population total since 2000. Besides the racial group designated "Other", the Asian population group comprises the second-largest ethnic minority in the service area, with over 1.3 million residents and almost 15 percent of the population. The White population has grown steadily since 2000 in number and in percent of the total, with nearly 5 million residents as of the 2015 Five-Year ACS. Conversely, the Black population has seen decline since 2000, down nearly 10 percent since its population of almost 840,000.

For the Los Angeles Urban County, the Dissimilarity Index shows a mix of moderate and high levels of segregation between the racial or ethnic groups. Asian (non-Hispanic) populations show the lowest race-specific levels of segregation with Whites (non-Hispanic) with an index of 53.0. Hispanics have the highest levels of segregation with an index of 64.9, while Blacks (non-Hispanic) show the next-highest index at 64.2. The Non-White and White populations show a segregation index of 55.7, indicating a high level of segregation within the Urban County. Long Beach and Los Angeles have the highest Dissimilarity Index values, with consistently moderate-to-high levels of segregation among the ethnic/racial groups. On the other hand, the entitlements of Baldwin Park, Bellflower, Downey, and Paramount have the lowest Dissimilarity Index values between the racial/ethnic groups.

The largest groupings of R/ECAP Census tracts can be found in downtown Los Angeles and, to a lesser extent, to the south in Long Beach. There are a few tracts designated as R/ECAP near San Fernando and to the north, in the Lancaster/Palmdale area. See Map IV.39 on page 126 for groupings of R/ECAPs in the service area.

In analyzing HUD data, White and Asian residents in the service area generally enjoyed greater access to proficient schools, particularly in Santa Monica and Glendora. Conversely, Hispanic and Black residents living in Palmdale, Inglewood, and Montebello lived among schools with the lowest levels of proficiency found anywhere in the service area.

Regarding job proximity across the service area, racial and ethnic groups enjoyed a relatively similar degree of access. The Labor Market Engagement Index values, however, show much more variation between the classes: even just in the Urban County, White and Asian residents have a much higher degree of labor market engagement than do Black and Hispanic residents.

The Low Transportation Cost Index shows low-to-medium variation among the racial or ethnic classes in the service area. Among residents in the Urban County, we observe very small variation between the racial or ethnic classes, with Hispanic residents enjoying the lowest transportation costs (score of 79.1) and White residents having the highest transportation costs (score of 71.9). The rest of the service area showed a great deal more disparity, with the highest

value occurring among Black residents in Santa Monica (score of 94.7) and Asian residents in Palmdale (score of 49.0). The Transit Trips index similarly shows little disparity among the racial or ethnic classes, with nearly 6.5 index value points separating the highest-scoring class (Hispanic) from the lowest-scoring class (White). And within the rest of the service area, there was only a range of 34.1 index value points, second-lowest among all indices.

Black residents and many foreign-born residents are clustered in areas with smaller Low Poverty Index values, with Asian residents living in areas with less exposure to low poverty areas in eastern Los Angeles County. White residents are much sparser in low income areas of the service area (see Map IV.98 on page 214). Finally, most families with children living south of downtown Los Angeles are located in neighborhoods with greater exposure to poverty, while those living further north near Santa Clarita and to the south near Torrance and Lakewood have significantly less exposure to poverty.

As shown in the map series beginning with Map IV.103 on page 221, the lowest Environmental Health index values in the service area occur in most of central, southern, and eastern Los Angeles County. This directly overlaps with most population clusters of Asian, Black, and Hispanic residents, although there is a significant portion of Hispanic residents living in (much cleaner) northern Los Angeles County.

The race or ethnicity experiencing the highest percentage of housing problems are found within the Hispanic population, with 66.5 percent of Hispanic households experiencing at least one housing problem. Hispanic and Black households are the only racial or ethnic categories to experience housing problems at a higher rate than the average (54.3 percent in the service area). The percentage of Asian households experiencing housing problems is far less than the Hispanic percentage, at around 50 percent for each group. White households fare even better, with only 43 percent of households experiencing any of the four housing problems.

Table IV.82 on page 303 shows publicly supported housing categories in the service area with demographics. Hispanic households constitute the majority of public housing households (over 62 percent), with Blacks representing another quarter of these households. Asian households constitute the largest share of households in Other Multifamily and Project-Based Section 8 housing. The largest share of White households in a public housing category occurs in Other Multifamily housing, with White households constituting nearly 30 percent of all households in this program.

For the Los Angeles County Service Area, the disabled population is dispersed fairly evenly throughout the general population, although a few areas do contain moderate concentrations. For instance, the city of Glendale, El Monte, northwestern Los Angeles, and Rolling Hills/Rolling Hills Estates appear to have higher concentrations of disabled residents aged 65 and older, while central and northern Los Angeles County appear to have moderate concentrations of disabled residents aged 18-64. Disability rates were shown to rise steadily among both male and female residents within older cohorts, with nearly 53 percent of residents in the service area having some form of disability. In younger age cohorts, male

residents reported having more disabilities, but in the oldest cohort, female residents have a higher disability rate, by nearly nine percentage points.

Fair housing complaints were most common in 2008, when 456 were logged, and have steadily grown in number since only 186 in 2012. Other complaints during that time, besides those already listed, were largely based on familial status, retaliation, national origin, and sex. Complaints found with cause logged mostly in 2008 and 2009, when nearly a third of all complaints with cause were logged during the time period 2008 through 2016. There are a number of organizations that provide fair housing services, including outreach and education, complaint intake, and testing and enforcement activities, for both providers and consumers of housing. These organizations include the U.S. Department of Housing and Urban Development (HUD), the California Department of Fair Employment and Housing (DFEH), which exists as substantially equivalent agency to HUD in the state, and the Housing Rights Center (HRC), which primarily operates in Los Angeles County.

The Housing Authority of the County of Los Angeles (HACoLA) provides fair housing resources for residents via its website, such as links to file complaints of a violation of fair housing, a link to the Housing Rights Center, a link to HUD's webpage on Fair Housing and Equal Opportunity, link to the National Fair Housing Advocate Online blog, a copy of HACoLA's non-discrimination policy, and a link to information on the Assessment of Fair Housing.

SECTION V. FAIR HOUSING GOALS AND PRIORITIES

Table V.1 below provides a list of the factors that have been identified as contributing to these fair housing issues, and prioritizes them according to the following criteria:

- 3. High: Contributing factors that have a direct and substantial impact on fair housing choice, especially in R/ECAP areas and those impacting persons with disabilities, and are core functions of HACoLA or the CDC.
- 4. Low: Contributing factors that may have a direct and substantial impact on fair housing choice buy are not within the core functions of HACoLA or the CDC, or not specific to R/ECAP neighborhoods, or have a slight or largely indirect impact on fair housing choice. These contributing factors will be provided to other agencies in which their core functions are designed to meet these needs. The CDC will create a matrix during the five-year term, 2018-2023, to determine which plans, policies, funding etc. can address the contributing factors by the other agencies and how the AFH goals can be coordinated with them in the future where appropriate.

Based on these contributing factors that are deemed high priorities, HACoLA and the CDC have proposed a series of goals and actions designed to address fair housing issues in the service area. These issues, and the goals that seek to address them, are listed in Table V.1 below.

Table V.1 A County of Los Angeles: Assessment of Fair Housing Fair Housing Goals, Issues, and Proposed Achievements: CDC Urban County

Fair Housing Goal	Contributing Factors	Fair Housing Issue	Priority	5-Year Goal	Metrics, Milestones, and Timeframe for Achievement	Investment Type
Enhance accessible facilities and	Barriers to mobility	Disparities in Access to	High	Perform 20 curb cut projects serving 50,000 people	Perform five (5) curb cut projects per year serving 10,000 people. This will consist of upgrading, installing, or replacing sidewalks to improve accessibility for persons that are disabled.	Placed Based Participating Cities
facilities and infrastructure for persons with disabilities	,	Opportunity		Perform 10 public facility projects	Perform two (2) public facility improvement projects per year to either City Halls or Parks to improve accessibility for persons that are disabled.	Placed Based Participating Cities

Discussion: The provision of accessible sidewalks, parks and city halls for persons with disabilities has been a significant issue, as reported from the Disability and Access Focus Group, per HUD data, and per local data. This issue was also raised by members of the general public during the Community Meetings.

Fair Housing Goal	Contributing Factors	Fair Housing Issue	Priority	5-Year Goal	Metrics, Milestones, and Timeframe for Achievement	Investment Type
Promote more affordable housing for special needs populations	Lack of affordable housing in a range of sizes	Segregation Disparities in Access to Opportunity Disproportionate Housing Needs	High	900 housing units	Issue funding through affordable housing Notice of Funding Availability that targets the production of affordable housing for Special Needs populations, including Homeless, Chronically Homeless, Homeless Veterans, Mentally III, HIV/AIDS, Developmentally Disabled, and Frequent Users of the County's Health and Mental Health systems. Allow for a range of unit sizes in funded projects and allow for new construction and rehabilitation projects. Work with the Department of Regional Planning to evaluate density bonus requests and record affordability covenants on density bonus units. Also, use Land Use Initiatives that will increase affordable units such as the Marina del Rey Affordable Housing Policy, which applies to the Urban County.	Placed Based and Mobility

Discussion: The demand for more affordable housing comes from many sectors throughout the LA County Service Area including but not limited to the disabled, elderly, transgendered, or racial and ethnic communities as evidenced by focus groups, survey responses, HUD data, and local data. The investment decision making process should consider the location of new or rehabilitated housing units. New construction and rehabilitation projects should be directed toward higher opportunity areas.

Fair Housing Goal	Contributing Factors	Fair Housing Issue	Priority	5-Year Goal	Metrics, Milestones, and Timeframe for Achievement	Investment Type
Enhance accessible housing and supportive services to persons with disabilities	Lack of sufficient accessible housing in a range of unit sizes	Disparities in Access to Opportunity	High	125 housing units	Require construction of accessible units (mobility and sensory) at twice the requirement of ADA and California Building Code. Units will be certified by California Access Specialists and listed on the Los Angeles County Housing Resource Center website. Require that senior units be constructed to meet Universal Design requirements, which includes accessibility features.	<u>Mobility</u>
	Barriers to mobility	Segregation Disparities in Access to Opportunity	High	Provide annual funding with HPI funds. Renew contract in December 2020.	Fund the Los Angeles County Housing Resource Center in order to provide an accessible website and call center that can assist persons with disabilities in locating units with accessibility features.	Place based
	Lack of sufficient publicly supported housing for persons with HIV/AIDS	Disparities in Access to Opportunity	High	50 housing units	Include HIV/AIDS as a unit type that is eligible for funding under the affordable housing Notice of Funding Availability.	<u>Mobility</u>
	Land use and planning decisions restrict fair housing choice for persons with disabilities and affordable housing in general	Segregation Disparities in Access to Opportunity Disproportionate Housing Needs	High	Identify any policy changes and work with Regional Planning and Cities to address.	Continue to review Housing Element and other plans as well as planning decisions for inconsistencies with land use and State law regarding affordable housing including for person with special needs in Year 1. In Years 2-5, work with Agencies by holding meetings/trainings/discussions to make any necessary improvements to the plans and policies.	Place based- Unincorporated Areas All Participating Cities R/ECAPS

Discussion: The provision of housing and housing related services to persons with disabilities has been a significant issue, as reported from the Disability and Access Focus Group and the general public during Community Meetings, and Resident Advisory Board Meetings, as well as HUD data and local data. There is not a sufficient number of affordable and accessible housing units available. This is further complicated by land use and planning decisions that hinders affordable housing and fair housing choice for persons with disabilities. See Section IV of this report for further detail of housing element compliance and whether any cities contribute to fair housing issues.

Fair Housing Goal	Contributing Factors	Fair Housing Issue	Priority	5-Year Goal	Metrics, Milestones, and Timeframe for Achievement	Investment Type
Promote healthy communities	Presence of lead poisoning exposure	R/ECAPs Disparities in Access to Opportunity Disproportionate Housing Need	High	Review 820 homes and businesses for the presence of lead-based paint. Ensure all homes are lead safe when performing rehab activities	The CDC will continue to implement HUD Lead Based Paint Regulations (Title X), which requires federally funded rehabilitation projects to address lead hazards by procuring with Certified Lead Consultants to conduct testing on all CDC existing loan and grant commercial and housing rehabilitation programs. The Lead Consultants will review 164 homes and commercial buildings for the presence of Lead-Based Paint each year (Years 1-5) Additionally, a Lead Abatement Program is offered to address hazardous materials including lead based paint, asbestos, mold, and other environmental hazards. This Program is also offered to first time homebuyers to assist in addressing lead based paint hazards at the close of escrow. First-time homebuyers participating under the HOME-funded Home Ownership Program (HOP) will have lead-based paint inspections and clearance reports for all homes built before 1978	Place based- Unincorporated Areas Participating Cities R/ECAPS
	There are significant disparities in the proportion of members of protected classes experiencing substandard housing when compared to the total population.	R/ECAPS Disproportionate Housing Needs	High	750 housing units will be assisted.	Loans, grants, and handyworker assistance will be provided to residents to repair their homes so that they are brought up to standard condition and meet health and safety standards. Repairs can include, but are not limited to, roofing, electrical, plumbing, and lead based paint hazard measures. Handyworker programs will consist of minor repairs. 150 housing units will be assisted per year.	Place based- R/ECAPS and adjacent unincorporated areas
	Noise Pollution due to plane traffic from Los Angeles International Airport (LAX)	R/ECAPs and other areas near LAX Disproportionate Housing Need	High	Complete 570 single-family and 375 multifamily grants with CDBG Complete 1,055 singlefamily or multifamily grants with other funding	Provide for the preservation of affordable single- and multi-family housing within the Athens and Lennox Area Airport Noise Compatibility Program. Complete 114 single- and 75 multi-family grants with CDBG. Use CDBG funds for code violation correction and leverage \$7.5 million from Los Angeles World Airports (LAWA) to sound mitigate properties in conjunction with Lennox Health and Safety, RSIP 5-Year plan. FAA/LAWA & CDBG funding requirement to sound insulate 2,000 dwelling units is estimated to cost \$98 million. CDBG funds represent 5%	Place based- Athens-Westmont Lennox

					or \$4.9 million of the above figure.	
Promote healthy communities (continued)	Poor land use and zoning situating sources of pollution and environmental hazards near housing	R/ECAPs Disparities in Access to Opportunity Disproportionate Housing Needs	High	Continue S00 feet policy for the 5-year Consolidated Plan period. Train participating cities on policy in Year 1.	Continue policy in the Notice of Funding Availability that applicants that propose projects within 500 feet of a freeway will not qualify for funding such as HOME Partnerships Investment and other applicable funding. Train participating cities in Year 1 to consider implementing the policy within their jurisdictions.	Place based- Unincorporated Areas All Participating Cities R/ECAPS
		R/ECAPs Disparities in Access to Opportunity Disproportionate Housing Needs	High	Identify any policy changes and work with Regional Planning and Cities to address.	Review Housing Element and other plans for inconsistencies with land use and environmental hazards in Year 1. In Years 2-5, work with Agencies by holding meetings/trainings/discussions to make any necessary improvements to the plans.	Place based- Unincorporated Areas All Participating Cities R/ECAPS
	Access to quality healthcare	R/ECAPs Disparities in Access to Opportunity Disproportionate Housing Needs	High	Serve 600 people	A Community Clinic will serve 60 low- and moderate-income persons in unincorporated and R/ECAP areas each year. The clinic will offer services such as wellness visits and school physicals, women's health services, STD testing, health maintenance guidance, primary care visits, prenatal exams, pediatric care, and mental health services.	Place based- R/ECAPS: Athens-Westmont Florence/Firestone Willowbrook
	Food insecurity Access to healthy and nutritious food options	R/ECAPs Disparities in Access to Opportunity	High	Assist 6,000 people	Food Distribution & CalFresh Applicants Outreach Project. Assist 1,200 people each year. This program will provide fresh and non-perishable foods to low- and moderate- income individuals and families to increase their health outcomes. In addition, participants will be assisted in accessing resources for food assistance.	Place based- R/ECAPS: Athens-Westmont Florence/Firestone Willowbrook

Discussion: The R/ECAP areas throughout the Los Angeles County Service Area tend to have substantive public health issues, such as noise pollution, toxic emissions or other environmental hazards, as evidenced by HUD data and local data. it remains important to educate our clientele about the risks of such exposures. These health issues were made apparent in community input and health-related research in LA County. Planning and zoning regulations may have contributed to this problem, so it is important that we review the local planning and zoning issues for those areas that are in or near the R/ECAPs. We also need to assist in making access to healthy food choices easier, take the initiative to conduct outreach to the community, and resolve our food deserts by increasing access to healthy foods. To address noise pollution in R/ECAPs, we will need to assist homeowners and owners of multi-family units with sound insulation improvements.

Fair Housing Goal	Contributing Factors	Fair Housing Issue	Priority	5-Year Goal	Metrics, Milestones, and Timeframe for Achievement	Investment Type
	Location and access to local			Assist 450 businesses	Technical Assistance Program. Serve 90 businesses per year with technical assistance to improve their operations.	Place based- Florence/Firestone
	businesses, especially in economically depressed areas	Disparities in Access to Opportunity	High	Assist 10 businesses	Second Districtwide Community Business Revitalization Program. Façade improvements to businesses. The program targets businesses in low- and moderate- income unincorporated and R/ECAP areas. Assist two (2) businesses per year.	Placed Based- R/ECAPS and other primarily low- and moderate income unincorporated areas
Enhance and create viable communities	Lack of Information on Affordable Housing	R/ECAPS Segregation	High	Maintain and execute two 1 year contract renewals with Emphasys Software to manage websites in LA County, City of LA, and Pasadena to keep contract through Dec. 2020. Seek funding authority to execute new sole source contract in 2020	Attend affordable housing events to distribute information to the public and developer communities, host stakeholder meetings for County affordable housing initiatives and available sources of funds for development of affordable housing, and support the efforts of the Southern California Association of Nonprofit Housing. Engage in Countywide efforts to market the on-line Los Angeles County Housing Resource Center (housing.lacounty.gov) through on-line links, and wide distribution of flyers at community events, landlord tradeshows, and any specialized citizen information fair or event. Expand marketing to include partner websites in Los Angeles and Pasadena. Provide toll-free bilingual call center with TTY number, and Section 508 Accessible website. Require all CDC funded projects to register on website.	Places Based Mobility
	Increasing R/ECAPs Segregation Segregation			50 housing units	Develop target program for the production of both affordable rental for racial and ethnic minorities in areas with low instances of minorities. 10 units per year.	<u>Mobility</u>
		High	Oversee lease up of 128 affordable units in unincorporate d areas with low instances of minorities within 5 years.	The CDC will oversee leasing of affordable rental units in areas such as West Hollywood (HOME-funded and bond financed units) and Marina del Rey (land use restrictions under the Marina del Rey Affordable Housing Policy. The County has also funded projects in Santa Monica.	<u>Mobility</u>	

Discussion: Enhancing and creating viable communities throughout the LA County Service Area is strongly desired by many throughout the service area. Community input, HUD data, and local data were clear on this point. Implementation barriers include lack of investment or business assistance and segregation in some parts of the service area in the R/ECAP areas as well as information on affordable housing and the segregation of some areas of the service area.as well as the availability of information on affordable housing.

Fair Housing Goal	Contributing Factors	Fair Housing Issue	Priority	5-Year Goal	Metrics, Milestones, and Timeframe for Achievement	Investment Type
				Serve 1,150 households per year. Collect five years of data to determine patterns of discrimination affecting mobility.	Serve 230 households per year with investigation of alleged violations of fair housing law. Counseling and/or cases will be opened or referred to other agencies. Annually report where they currently live, where the alleged infraction occurred, protective class, and issue code (type of discrimination, etc.). This data will be collected to determine patterns of discrimination affecting mobility. This will allow us to target resources as necessary either during the five (5) year period or for the next AFH.	Place based and Mobility based
Promote understanding and knowledge of fair housing and ADA laws	Discrimination in private rental and homes sales markets	Disparities in Access to Opportunity Discrimination Segregation	High	Distribute 80,000 pieces of literature. Conduct 80 outreach and educational presentations/ workshops. Staff 100 fair housing information booths. Conduct 40 fair housing special media efforts Host 15 fair housing special events.	The following training activities will be held to bring awareness to fair housing issues affecting persons accessing the private rental and home sales markets: Distribute 16,000 pieces of literature per year. Conduct 16 outreach and educational presentations and workshops per year to inform special populations of their rights. Staff 20 fair housing information booths at community festivals and annual events. Conduct eight (8) fair housing special media efforts per year. Host three (3) fair housing special events per year.	Place based and Mobility based
	Lack of on-line fair housing material to distribute information	Disparities in Access to Opportunity	High	Ensure all websites that fall under the Los Angeles Urban County provide adequate information on fair housing.	Annually review content of on-line referral services and verify that content is adequate. This includes websites for all participating jurisdictions.	Place based and Mobility based

Access to financial services	Segregation R/ECAPs Disparities in Access to Opportunity Disproportionate Housing Needs	High	Conduct 5 outreach and educational presentations.	Conduct outreach and education on fair lending and what constitutes discriminatory lending, annually. Conduct one (1) outreach and educational presentation per year to private lenders. Also, use media, mailings, and other methods to enhance outreach and education.	Place based and Mobility based

Discussion: Consistent with previous Analysis of Impediments to Fair Housing Choice, the Los Angeles County Service Area continues to have challenges in its fair housing arena, per community input, HUD data, and local data. One of the most troubling are the persistence if discriminatory actions taken in the marketplace, primarily by private landlords and lenders. Further complicating this are the lack of knowledge and understanding of fair housing and ADA laws by both consumers and providers of housing.

Fair Housing Goal	Contributing Factors	Fair Housing Issue	Priority	5-Year Goal	Metrics, Milestones, and Timeframe for Achievement	Investment Type
Coordinate the AFH with other agencies' plans and programs to address contributing factors	Lack of coordination with other Planning Processes and Programs to address contributing factors	Segregation R/ECAPs Disparities in Access to Opportunity Disproportionate Housing Needs	High	Coordinate the AFH with other Agencies to address Contributing Factors that are in their area of influence Track progress annually in the Annual Action Plans	In Year 1, identify the agencies and their plans and funding, if any, that could address the contributing factors that are low priorities for the CDC due to them not being core functions of the agency. Provide those agencies with the contributing factors and determine if there is a need not being addressed or planned to be addressed with their plans or programs. In Year 2, explore if an unmet need can be addressed as an eligible activity under either the CDBG or HOME program. Also, determine if AFH actions can be coordinated with other agency plans and programs to address the unmet needs. Throughout the five year period, progress will be tracked in the Annual Action Plans.	Placed based and mobility

Discussion: There were several concerns through the community participation and consultation process that there is a lack of coordination in providing services in general. The CDC has determined that some contributing factors are low priorities due to them being core functions of other agencies such as the Metropolitan Transportation Authority or METRO for short or the Department of Public Health. The CDC is committed to inform these agencies of the identified contributing factors and determine if they are either addressing them, plan to address them, or if there are any unmet needs that may be filled with limited Federal funding available to the CDC. Also, determine of AFH actions can be coordinated with other agency plans and programs. A matrix will be developed and progress will be tracked and made available in the Consolidated Plan and Annual Action Plans.

Fair Housing Goal	Contributing Factors	Fair Housing Issue	Priority	5-Year Goal	Metrics, Milestones, and Timeframe for Achievement	Investment Type
	Public safety concerns R/ECAPs	R/FCAPs	High	Serve 100 homeowners	Homeowners Fraud Prevention. This program will serve 20 low-income homeowners per year from being victims of fraud in the purchase of a home, equity transactions including identity theft; and in the purchase of household goods and services.	Place based – Athens/Westmont Florence/Firestone Lennox Willowbrook
			Serve 1,100 youth	Drug Prevention and Gang Intervention Program. Assist 220 youth per year with diversion activities such as recreational and educational activities.	Place based – Florence/Firestone, Lennox	
				Assist 168,450 people	Graffiti Removal Program in the City of Bell. Assist 33,690 people per year	Placed Based- City of Bell

Discussion: Public safety and anti-crime activities are in significant demand, as noted in several of the Community Meetings, particularly those held in R/ECAP areas, as well as crime statistics reported by the LA County Sheriff and HUD data. There were additional concerns related to hate crime research, particularly towards Muslims and gay communities.

Fair Housing Goal	Contributing Factors	Fair Housing Issue	Priority	5-Year Goal	Metrics, Milestones, and Timeframe for Achievement	Investment Type
Enhance Limited English Proficiency services in R/ECAP areas	Lack of LEP services	R/ECAPs Disparities in Access to Opportunity	High	Assess CDBG- funded agencies in R/ECAP areas that are in need of translation or interpretation services to serve their clientele. Provide services or funding to agencies for said services on an as needed basis.	Enhance LEP outreach to non-English speaking persons annually. In Year 1-2, agencies will be assessed for any need they may have to serve persons with limited English skills. In Year 3-5, the agencies will be supported on an as needed basis with either services or funding to provide needed translation or interpretation services.	Placed Based- Athens/Westmont Florence/Firestone Lennox Willowbrook City of Bell

Discussion: During the Focus Groups and identified in the surveys, HUD data, and local data, it was expressed that there is a lack of services in low-income areas to assist persons with limited English proficiency which severely narrowed access to available services.

Table V.2 B

County of Los Angeles: Assessment of Fair Housing
Fair Housing Goals, Issues, and Proposed Achievements: HACoLA Service Area

Fair Housing Goal	Contributing Factors	Fair Housing Issue	Priority	5-Year Goal	Metrics, Milestones, and Timeframe for Achievement	Investment Type
	Public safety concerns	R/ECAPs Disproportionate Housing Needs	High	1. Annually 2. Hold 15 meetings in five (5) years 3. Hold 120 meetings in five (5) years.	Continue to engage in community policing through Community Policing Teams (CPTs). The CPTs meet quarterly and ascertains the crime prevention needs of the housing sites. CPTs hold monthly Task Force by 2 service areas with the respective Area Manager and Counsel to monitor progress in crime prevention and addressing public safety concerns.	Place based
	Violent and drug related crime in public housing	R/ECAPs	High	1. Annually 2. Hold 15 meetings in five (5) years	Continue with Crime Prevention Unit and crime reduction programs. Convene meetings quarterly and report statistics on progress in keeping sites safe.	Place based
Promote lower rates of crime	Minority and low- income communities experience higher rates of crime and violence	Segregation Disparities in Access to Opportunity	High	1. Annually	Provide training and technical assistance to law enforcement agencies, County and City departments, and other housing authorities annually.	Place based
	Criminal activity in public housing facilities	R/ECAPS Disparities in Access to Opportunity	High	1. Annually 2. Hold 15 meetings in five (5) years	Continue Crime Prevention Through Environmental Design (CPTED) measures currently in place at HACoLA including installation of CCTV systems. Convene quarterly meetings with the CPT and CPTED staff to monitor progress and report on accomplishments quarterly.	Place based
	Juvenile crime activity	R/ECAPs Segregation	High	1. Annually 2. Hold 15 meetings in five (5) years	Continue Juvenile Justice Crime Prevention Act (JJCPA) activities throughout the year. Convene meetings to monitor progress and report on accomplishments quarterly.	Place based
	Rising crime statistics for burglary, theft and drug related crimes	R/ECAPs	High	1. Annually 2. Annually	Provide enhanced security measures as needed at public housing facilities including installation of CCTV systems. Review security contracts annually.	Place based

Discussion: Public safety and anti-crime activities are in significant demand, as noted in several of the Community Meetings, particularly those held in R/ECAP areas, as well as crime statistics reported by the LA County Sheriff and HUD data. Additional research points to the troubling presence of hate crimes in LA County. Many people wanted to know where the sheriff was during the Community Meetings, wishing that their voices were heard by the sheriff. Transcripts of those hearings have been prepared and submitted to the Sheriff. People also addressed the notion that there was little done to respond to their concerns in the past.

Fair Housing Goal	Contributing Factors	Fair Housing Issue	Priority	5-Year Goal	Metrics, Milestones, and Timeframe for Achievement	Investment Type
	Increase independence for the elderly or families with disabilities Increase independent living arrangements for people with disabilities	Disparities in Access to Opportunity Disproportionate Housing Needs	High	1. Annually 2. Annually 3. Annually 4. Annually	Apply for additional Resident Opportunity and Self Sufficiency (ROSS) grants annually. Continue to implement assisted living waiver program (ALWP) as state funding permits at senior sites. Currently the ALWP has been implemented at South Bay Gardens, Orchard Arms, and Lancaster Homes housing developments. Monitor progress and report annually. Continue to provide reasonable accommodations through HACoLA's Reasonable Accommodation request procedures. Monitor progress and report annually.	Mobility
				1. Annually	Continue to implement current review and approval of reasonable accommodations practices and track all ADA requests.	Place based
Enhance accessible housing and supportive services to persons with disabilities	Lack of sufficient accessible housing in a range of unit sizes	Disparities in Access to Opportunity	High	1. Conversion/ Rehabilitation activities to benefit a minimum of 6,500 units in five (5) years 2. Annually	Promote conversion activities to benefit a minimum of 1,300 units annually to include accessibility features of existing ADA units and non-ADA units in a range of sizes for persons with disabilities annually as funding permits. Monitor progress and report annually.	Mobility
	Lack of programs to support people with disabilities to adapt to their housing	Disparities in Access to Opportunity	High	1. Annually	Conduct mobility workshops for residents (ex: fall prevention, alert systems) throughout the year. Keep record of workshops.	Place based
	People with disabilities becoming homeless	Disparities in Access to Opportunity Disproportionate Housing Needs	High	1. Annually and as needed	Partner with other County agencies to identify housing prior to a resident or applicant becoming homeless and make referrals.	Place based
	Barriers to mobility	Segregation Disparities in Access to Opportunity	High	1. Annually	Utilize the Green Physical Needs Assessment (GPNA) to address barriers to mobility annually as funding permits.	Place based
	Lack of mental health services for school age children of public housing	Disparities in Access to Opportunity	High	Provide services to 100 residents annually	Continue to connect residents with resources including Department of Mental Health case management and services provided HACoLA case managers on-site.	Place based
	Barriers to accessing transportation services	Disparities in Access to Opportunity	High	Update information annually	Provide residents with transportation information on the HACoLA website regarding available mobile applications, and transportation websites.	Place based

Fair Hou	using Goal	Contributing Factors	Fair Housing Issue	Priority	5-Year Goal	Metrics, Milestones, and Timeframe for Achievement	Investment Type
		Access to transportation for seniors and disabled	Segregation Disparities in Access to Opportunity Disproportionate Housing Needs	High	Update and Provide information annually	Provide transportation information to residents at Resident Council Forum meetings and include this information in the HACoLA LINK Newsletter annually.	Place based

Discussion: The provision of housing and housing related services to persons with disabilities has been a significant issue, as reported from the Disability and Access Focus Group, as well as during Community Meetings, and Resident Advisory Board Meetings. There is not a sufficient number of affordable accessible housing units available, per community input and HUD and local data. Both the CDC and the HACoLA will devote additional resources to this need.

Fair Housing Goal	Contributing Factors	Fair Housing Issue	Priority	5-Year Goal	Metrics, Milestones, and Timeframe for Achievement	Investment Type
Create viable communities	Access to affordable internet	Disparities in Access to Opportunity	High	1. Annually 2. Annually 3. Annually	1. Continue to expand cable/internet access to housing development sites, as funding permits, annually. The Housing Authority currently has cable/internet access at three (3) housing developments: Carmelitos, Whittier Manor, and Herbert. 2. Continue to provide computer/internet access at HACoLA's largest sites in the Family Learning Centers at Nueva Maravilla, Harbor Hills and Carmelitos. 3. When providing Project-Based Voucher funding to developers that Construct or Rehabilitate Affordable Housing Developments, continue to require, as mandated by the Federal Communications Commission and the U.S. Department of Housing and Urban Development, Broadband Infrastructures that permits residents to acquire low cost internet services.	Place based

Discussion: The desire to enhance as well as create viable communities throughout the LA County Service Area is a strong desire by many throughout the service area. Part of this is due to the lack of Community Reinvestment Act investments in lower income areas (per CRA data analysis), lack of mortgage lending in lower income areas and with racial and ethnic minorities (per HMDA data analysis). As well, public investments for such things as public parks, recreation centers and other public facilities is felt to be less in R/ECAP areas, as evidenced by the community input process of the AFH.

Fair Housing Goal	Contributing Factors	Fair Housing Issue	Priority	5-Year Goal	Metrics, Milestones, and Timeframe for Achievement	Investment Type
	Industries not in compliance with health regulations Pollution in Neighborhoods Illegal Dumping Proximity to environmental hazards, especially in communities of color	R/ECAPs Disparities in Access to Opportunity	High	Update information annually	Continue to facilitate environmental review process and adhere to state requirements and procedures. Refer residents to responsible agencies as needed and include information on HACoLA website.	Place based
	Food insecurity Access to healthy and nutritious food options	R/ECAPs Disparities in Access to Opportunity	High	Annually Seasonally and Annually	Continue to promote access to food assistance programs like CalFresh and Women, Infants, and Children (WIC) through the HACoLA LINK Newsletter and on the HACoLA website annually. Continue the Growing Experience Program that provides fresh produce at a low cost to residents and the local Long Beach community.	Place based
Promote healthy communities	Enhance adequacy of life skills (e.g. Housekeeping, healthy eating, financial management)	Disparities in Access to Opportunity	High	1. Hold 15 Resident Council Forum meetings in five (5) years; hold training seminars annually 2. Hold 15 Resident Council Forum meetings in five (5) years; hold training seminars annually 3. Hold life skills training as new residents are admitted, annually	1. Continue to provide training seminars to residents on life skills at the quarterly Resident Council Forum meetings and on-site resident meetings. 2. Continue partnerships with outside agencies to provide training seminars for Public/Affordable Housing residents. 3. Provide life skills training at New Resident Orientation.	Place based
	Enhance air quality within housing development sites	R/ECAPs Disparities in Access to Opportunity	High	1. Implemented Smoke-Free Policy effective July 1, 2014	Continue to enforce Smoke-Free policy in all developments (except South Bay Gardens where smoking is permitted in a specified open area that is at least 25 feet away from a Housing Authority building that is clearly labeled "Smoking"	Place based

		Designated Area"). Ensure that all residents, guests, visitors, vendors, contractors, and staff are in compliance with policy.	
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Discussion: The R/ECAP areas throughout the LA Service Area tend to have substantive public health issues. Whether that is through pollution, toxic emissions or other environmental hazards, it remains important to educate our clientele about the risks of such exposures. These exposures have come to light from extensive research of HUD and local data regarding healthy communities, explored in greater detail in Section IV. Furthermore, we must recognize our past role through planning and zoning that may have contributed to this problem. Hence, we need to review the local planning and zoning issues for those areas that are in or near the R/ECAPs. Furthermore, to assist in making access to health food choices easier, we must take the initiative and conduct outreach to the community and resolve our food deserts and increase access to healthy foods.

Fair Housing Goal	Contributing Factors	Fair Housing Issue	Priority	5-Year Goal	Metrics, Milestones, and Timeframe for Achievement	Investment Type
Promote more affordable and accessible housing	Instances of absentee/bad landlords	Disparities in Access to Opportunity Disproportionate Housing Needs	High	1. Annually 2. Annually	Continue to outreach and provide owner education workshops regarding subsidized rental programs, as well as tenant/landlord California laws Continue to enforce HUD regulations regarding owner suitability	Place based
	Access to affordable rental housing	Segregation R/ECAPs Disparities in Access to Opportunity Disproportionate Housing Needs	High	1. Annually 2. Annually 3. Annually	Promote conversion of units to include accessibility features of existing ADA units and non-ADA units annually. Utilize the GPNA to identify and assess ADA needs and implement as funding permits, annually Monitor and track the number of units and/or other accessibility features annually.	Place based
	Lack of availability of accessible housing options	R/ECAPs Disparities in Access to Opportunity Disproportionate Housing Needs	High	1. Annually 2. Annually	Continue and enhance resident services programs for all residents, including specialized programs for youth. Continue to provide college scholarships through the Community Development Foundation (CDF) annually.	Place based
	Enhance place based investments	Disparities in Access to Opportunity	High	1. Annually 2. Annually 3. Annually	Preserve public housing by continuing to address GPNA recommendations annually as funding permits. Expand accessibility programs for public housing tenants. Apply for available funding opportunities for additional rental assistance vouchers and explore ways to increase housing opportunities for target populations (i.e. Homeless, Special Needs Families).	Place based

Discussion: The demand for more affordable and accessible housing comes from many sectors throughout the LA County Service Area as evidenced through the community input process of the AFH, as well as analysis of HUD and local data. Whether the disabled, elderly, transgender, or racial and ethnic communities, the County needs to have in place additional affordable and accessible housing. It is of particular merit that the location of where these new housing units are constructed, or housing is renovated, should play in the investment decision process. New construction should be directed to higher opportunity areas, with selected renovation in R/ECAP areas.

Fair Housing Goal	Contributing Factors	Fair Housing Issue	Priority	5-Year Goal	Metrics, Milestones, and Timeframe for Achievement	Investment Type
	Enhance Section 504 to make it fair and equitable	Disparities in Access to Opportunity	High	Annually Update information annually	Provide all applicants the "Housing Authority's Process to Request a Reasonable Accommodation and/or Reasonable Modification" information form on the HACoLA website, to residents and in the application packet. Update annually the listing of ADA Units and accessibility features of housing sites on HACoLA's website.	Place based
	Lack of knowledge of Fair Housing and ADA laws	Disparities in Access to Opportunity	High	1. Annually	Continue to conduct ADA and Fair Housing training for all new employees annually.	Place based
Promote understanding and knowledge of fair housing and ADA laws	Disconnect in matching people with disabilities with the right housing resources	Disparities in Access to Opportunity	High	1. Annually 2. Update information annually 3. Update information annually	1. HACoLA will continue to provide a family that is disabled and requires specific accessible features, priority for vacant ADA units. HACoLA offers a vacant ADA unit first to current units and then to an eligible qualified applicant that requires the special features of the vacant unit. 2. HACoLA will provide all applicants the "Housing Authority's Process to Request a Reasonable Accommodation and/or Reasonable Modification" Information Form on the HACoLA website and in the application packet. 3. Update the listing of ADA Units and accessibility features of housing sites on HACoLA's website annually.	Mobility
	Inefficient process to assign accessible housing	Disparities in Access to Opportunity Disproportionate Housing Needs	High	1. Annually 2. Update information annually 3. As requested by applicants and residents, annually 4. As the need arises, annually	1. HACOLA will provide all applicants the "Housing Authority's Process to Request a Reasonable Accommodation and/or Reasonable Modification" information form on the HACOLA website and in the application packet. 2. Update annually the listing of ADA Units and accessibility features of housing sites on HACOLA's website. 3. HACOLA will continue to provide a family that is disabled and requires specific accessible features, priority for vacant ADA units. HACOLA offers a vacant ADA unit first to current units and then to an eligible qualified applicant that requires the special features of the vacant unit. 4. HACOLA will continue to require a signed	Place based

					Waiver Form from each resident that is housed in a unit with accessible features where the resident does not require a unit with such features. Pursuant to this waiver, a unit with accessible features can be assigned to a resident or applicant that is disabled as the need arises.	
Promote understanding and knowledge of fair housing and ADA laws (continued)	Discrimination in the private accessible rental markets	Segregation R/ECAPs Disparities in Access to Opportunity Disproportionate Housing Needs	High	1. Monthly 2. Annually 3. Annually	For Section 8 participants, continue to provide mobility counseling at voucher briefing sessions. For Section 8 participants, continue to provide access to enhanced Housing Navigation Resources Continue to provide and review information on the Housing Authority Website and briefing session regarding reporting Housing Discrimination.	Place based

Discussion: Consistent with previous Analysis of Impediments to Fair Housing Choice, the Los Angeles County Service Area continues to have challenges in its fair housing arena. One of the most troubling is the persistence of discriminatory actions taken in the marketplace, primarily by private landlords and lenders (as evidenced by community input received from the 2017 Resident Fair Housing Survey). Further complicating this are the lack of knowledge and understanding of fair housing and ADA laws by both consumers and providers of housing.

Fair Housing Goal	Contributing Factors	Fair Housing Issue	Priority	5-Year Goal	Metrics, Milestones, and Timeframe for Achievement	Investment Type
Enhance employment opportunities	Disparities in job readiness and educational achievement	R/ECAPs Disparities in Access to Opportunity	High	Provide services to 100 residents annually	Conduct job readiness training for public housing residents annually. Partner with Workforce Development, Aging, and Community Services (WDACS) to enhance collaboration on existing program efforts as well as design new initiatives for workforce readiness and employment opportunities.	Mobility

Discussion: One of the keys to empowerment is the ability to secure gainful employment, particularly that which pays a reasonable and livable wage. The CDC and the HACoLA are committed to assisting households in the LA County Service Area to secure this type of employment opportunity, either through job training, retraining, recruitment, and job retention. HUD data and maps showing the Labor Market Engagement Index show areas for improvement in engaging in the workforce for low-income areas and R/ECAPs (see Section IV of this report for further detail).

Fair Housing Goal	Contributing Factors	Fair Housing Issue	Priority	5-Year Goal	Metrics, Milestones, and Timeframe for Achievement	Investment Type
		I		T	Continue and enhance resident services	T
Facilitate access to proficient schools	Enhance place based investments	Disparities in Access to Opportunity	High	1. Annually 2. Annually 3. Provide services to 200 residents annually 4. Annually	programs for all residents, including specialized programs for youth. 2. Continue to provide college scholarships through the CDF, annually. 3. Continue to provide computer classes/labs, afterschool programs for youth, financial literacy, nutrition workshops, and enrichment activities at the HACoLA Family Learning Centers (FLC). 4. Continue to convene the CDF annual Reality Check Conference where HACoLA youth are provided with scholarships, educational seminars, and skill development to assist them in achieving their goals.	Place based
	Availability of scholarships, especially for Section 8 families	Disparities in Access to Opportunity	High	1. Annually	Continue to provide scholarships for residents as funding permits through the CDF.	Mobility

Discussion: A key issue to ensuring that future generations can ascend the latter to greater economic opportunity is the ability to have access to a good education. In many areas of the Los Angeles County service area, this remains a challenge. However, several issues related to substantive concerns for communities of color, as well as those in lower income neighborhoods, remain to be worked on, as noted above. HUD-provided data and maps show the School Proficiency Index as low-scoring in low-income and R/ECAP areas (see Section IV of this report for further detail).

Fair Housing Goal	Contributing Factors	Fair Housing Issue	Priority	5-Year Goal	Metrics, Milestones, and Timeframe for Achievement	Investment Type
Promote facilities and services for the homeless	Enhance programs to help at-risk homeless population	R/ECAPs Disparities in Access to Opportunity Disproportionate Housing Needs	High	1. Annually 2. Annually	Continue to receive referrals from Los Angeles Homeless Services Authority (LAHSA) to house homeless families and provide case management for these families to remain housed. As funding and regulatory requirements permit, continue to commit through a competitive Notice of Funding Availability, Project-Based Vouchers, to developers that target affordable housing development that will house special needs populations, such as at-risk of homeless and/or homeless populations.	Place based
	Homelessness prevention programs	Disparities in Access to Opportunity Disproportionate Housing Needs	High	1. Annually 2. Annually	Prioritize rapid rehousing and provide ancillary services through LAHSA coordinated with CDC and HACoLA. Using Measure H Funding, continue to evaluate and expand the Homeless Incentive Program to entice landlords to rent available rental units to the homeless and homeless veteran's.	Place based

Discussion: The number of persons who are homeless in the Los Angeles County Service area has continued to expand over the years and was a topic discussed in the community input process of the AFH. It is a significant challenge due to the both housing and special needs services required of this sub-population. Still the LAHSA has the capacity and capability to address these challenges. The CDC and the HACoLA are committed to working with the LAHSA to ensure that these populations are addressed in a consistent and constant method and fashion.

Fair Housing Goal	Contributing Factors	Fair Housing Issue	Priority	5-Year Goal	Metrics, Milestones, and Timeframe for Achievement	Investment Type
Enhance transit services	Access to transportation for parents and children	Disparities in Access to Opportunity	High	Update information annually	HACoLA will inform residents of resources and options for transportation on the HACoLA website.	Place based
	Lack of availability of bus passes	Disparities in Access to Opportunity	High	Update information annually	HACoLA will inform residents of resources and options for transportation on the HACoLA website. HACOLA WEBSITE.	Place based

Discussion: Enhancing the public travel experience is another key aspect for householders, particular those residing in the R/ECAPs to secure enhanced public transit and be able to get to the jobs. The community input process was critical in understanding the importance of this goal, and analysis of HUD and local data confirms this.

Fair Housing Goal	Contributing Factors	Fair Housing Issue	Priority	5-Year Goal	Metrics, Milestones, and Timeframe for Achievement	Investment Type
Other fair housing goals	Lack of resources and services for working families (e.g., helping find housing for minorities)	Disparities in Access to Opportunity	High	1. Update information annually 2. Annually 3. Annually 4. Provide services to 200 residents annually	Continue to provide a current listing of housing units on the HACoLA website. Continue and enhance resident services programs for all residents, including specialized programs for youth. Continue to provide college scholarships through the CDF, annually. Continue to provide computer classes/labs, afterschool programs for youth, financial literacy, nutrition workshops, and enrichment activities at the HACoLA Family Learning Centers (FLCs).	Place based
	Low levels of parent involvement	Disparities in Access to Opportunity	High	1. Annually	Conduct outreach to parents with Limited English Proficiency and computer access annually.	Place based
	Access to affordable childcare	Disparities in Access to Opportunity	High	Provide services for 200 residents annually	Continue to refer residents to child care centers that provide services to low income families. HACoLA has child care centers in Harbor Hills, Nueva Maravilla, and off-site childcare centers through the Long Beach Head Start program and at the Bright Futures Child Development Center in South Los Angeles.	Place based

Discussion: There are several other concerns that we must consider in evaluation fair housing issues for the Los Angeles County Service area, brought to light through the community involvement process and analysis of HUD and local data. While these do not necessary fit well into any other category it in no way lessens their significant importance to promoting the economic vitality of the County.